TSD File Inventory Index

Date: November 14, 2006

Initial: C. McKeever

Facility Name: Badger Disposal of Wisconsin, Inc.

Facility Identification Number: WID 988 580 056

A.1 General Correspondence A.1.3	1	**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status A.2	1	.1 Correspondence B.1.1 - B.1.4	1
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA) B.1.2 (5), B.1.5	6
.2 Notification and Acknowledgment	Y	**C.1 Compliance - (Inspection Reports)**	
.3 Part A Application and Amendments	Y	**C.2 Compliance/Enforcement** C.2	1
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents** C.3	1
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports D.1.4	1
.2 Closure/Post Closure Plans, Certificates, etc		**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record B.1	1	.4 RFI Draft /Final Report	

Total - 12

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.
Comments:_____
_____

Please mail on 3-16-12

[redacted]

ITEM: Badger Disposal Information Request
WID 988580056

	INITIAL & DATE	ORC	*INITIAL & DATE*
STAFF:	Michael Cunningham 3-7-12	STAFF COUNSEL:	3-8-12
APA:		SECTION CHIEF:	3-14-12
SECTION CHIEF:		BRANCH CHIEF:	
BRANCH CHIEF:		REGIONAL COUNSEL: *IF CONSULTATION HAS OCCURRED [ ]*	
DIVISION APA:			
DIVISION DIRECTOR:			
OTHERS:			

DEPUTY REGIONAL ADMINISTRATOR: _____

REGIONAL ADMINISTRATOR: _____

RETURN TO: _____

PHONE#: _____

COMMENTS: _____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 16 2012

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL 7009 1680 0000 7642 3564
RETURN RECEIPT REQUESTED

Mr. Ron Mitchell
General Manager
Badger Disposal of Wisconsin, Incorporated
5611 West Hemlock Street
Milwaukee, Wisconsin 53223

Re: Request for Information
Badger Disposal of Wisconsin, Incorporated
U.S. EPA ID Number: WID 988 580 056

Dear Mr. Mitchell:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

On March 1, 2010 Badger Disposal of Wisconsin, Incorporated (Badger Disposal) submitted its 2009 Hazardous Waste Export Report to EPA as required under 40 C.F.R. § 262.56. This request requires Badger Disposal to submit certain information relating to that Report. The specific information requested is being sought pursuant to Section 3007 of RCRA and is described in the Information Request enclosed with this letter. You must submit this information within 30 calendar days of receiving this request to the U.S. Environmental Protection Agency, Attention: Michael Cunningham, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under the regulations at 40 C.F.R. Part 2, Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 C.F.R. § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 C.F.R. Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

Badger Disposal must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any

portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject Badger Disposal to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928. You should direct questions about this request for information to Michael Cunningham at (312) 886-4464.

Sincerely,

Paul Little

Paul Little, Chief
RCRA Compliance Section 2

Enclosure

cc: Patricia Chabot, WDNR (w/enclosure) (pat.chabot@wisconsin.gov)

Request for Information
Badger Disposal of Wisconsin, Inc.

Definitions

For the purpose of the Instructions and the Information Request set forth herein, the following definitions shall apply:

1. The term "you" or "Respondent" shall mean Badger Disposal of Wisconsin, Inc. (Badger Disposal), Badger Disposal's officers, managers, employees, contractors, trustees, and agents.

2. The term "furnish," "describe," "provide," or "indicate" shall mean turning over to the Agency either original or duplicate copies of the requested information in the possession, custody, or control of the Respondent. Where specific information has not been memorialized in any document but is nonetheless responsive to a request, you must respond to the request with a written response. If such requested information is not in your possession, custody, or control, then indicate where such information or documents may be obtained.

3. "And" as well as "or" shall be construed either conjunctively or disjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.

4. "Person" means an individual, trust, firm, joint stock company, federal agency, corporation (including a government corporation), partnership, association, the state of Wisconsin or any state of the United States, municipality, commission, political subdivision of the state, or any interstate body.

5. "Facility" means the Respondent's property at 5611 West Hemlock Street, Milwaukee, Wisconsin.

6. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in RCRA, 42 U.S.C. § 6901 et seq., as amended or Wisconsin Administrative Code NR 600-679, in which case the statutory or regulatory definitions shall apply.

Instructions

You must respond separately to each of the questions or requests in this enclosure. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

Manifest Number	Date	Line	Number/Type of Container	Quantity
005357894 JJK	02/06/09	2	1 DM	55 gallons
005357894 JJK	02/06/09	3	1 DM	55 gallons
005357913 JJK	02/06/09	1	8 DF	440 gallons
005357918 JJK	02/06/09	1	13 DF	715 gallons
001068010 GBF	11/03/09	3	1 DF	55 gallons

For the containers listed on the manifests above provide information on how the weight of each container was determined. Provide any and all documentation of measurements or calculations made in determining each container's weight.

5. The amount of Waste Corrosive Liquid (UN3264) listed in Badger Disposal's 2009 Primary Exporter of Hazardous Waste Annual Report is 2,375 pounds. That waste type is listed on the following manifests from Badger Disposal:

Manifest Number	Date	Line	Number/Type of Container	Quantity
005357894 JJK	02/06/09	2	1 DF	55 gallons
005357913 JJK	02/06/09	3	8 DF	440 gallons
005357913 JJK	02/06/09	4	3 TP	825 gallons

For the containers listed on the manifests above provide information on how the weight of each container was determined. Provide any and all documentation of measurements or calculations made in determining each container's weight.

6. Badger Disposal's 2009 Primary Exporter of Hazardous Waste Annual Report does not include a shipment amount for Waste Environmentally Hazardous Substances, Liquid, N.O.S. (sodium sulfide) UN3082. However, line 2 of manifest number 001068011 GBF from Badger Disposal, dated 11/03/09, lists 1 DF with a quantity of 55 gallons of that material. Please indicate why that material was not included in Badger Disposal's 2009 Annual Report.

7. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

WID 988 580 056

BADGER DISPOSAL
Badger Disposal of WI, Inc.

January 10, 2011

Margaret M. Guerrriero
Director, Land and Chemicals Division
U.S. EPA Region 5
Mail Code L8J
77 West Jackson Boulevard
Chicago, IL 60604

Dear Ms. Guerriero,

Enclosed please a copy of an incident report and accompanying information regarding a fire that took place on December 24, 1010 at Badger Disposal of WI., Inc. 5611 West Hemlock Street, Milwaukee WI 53223 EPAID# WID988580056.

If you have any questions regarding this matter please contact me at 414-760-9175 ext. 221.

Sincerely,
Badger Disposal of WI., Inc.

Kandylee Schmit
Compliance Officer

cc: Ms. Sandra J. Miller, Waste Mgmt. Specialist-WIDNR Sturgeon Bay, WI
John Schwabe, CHMM, PS, Waste Mgmt. Specialist SE Region-Waukesha Ctr. WIDNR (letter)

5611 W. Hemlock St. Milwaukee, WI 53223
866-271-0961 • 414-760-9175 • Fax: 414-760-9189 • www.badgerdisposal.com

BADGER DISPOSAL OF WI. INC. INCIDENT REPORT

Incident Log No. 2

1. Site/location of incident 5611 West Hemlock Street, Milwaukee WI 53223

2. Date 12/24/2010 Time 12:00 pm Duration Approximately 10 minutes

3. Description of incident: On 12/24/2010 at 12:00 pm, Badger Disposal received a telephone call from ADT – our facility Security company that a fire had been detected in the North Drum Warehouse. Upon investigation it was determined that a container inside of a 30 gallon plastic drum reacted and caused a fire. The fire was extinguished by the facility AFFF suppression system before the fire department arrived.

4. Amount & type of hazardous chemical substance(s) released:
No chemical substances were released. Everything was contained within the warehouse

BADGER Waste Approval No. (if applicable): WS014373

5. Equipment involved: Drum X Small Container
Tanker ___ Truck ___ Pump ___
Sump ___ Hose
Other

6. Cause of incident:
Mechanical/electrical failure
Operator error
Procedural failure
Contractor-caused incident
Incident beyond BADGER control X
Act of God
Instrumentation
Other

7. Hazardous chemical substance(s) released to: Air N/A
Water N/A Land N/A Groundwater N/A
Bldg Floor N/A Secondary containment
Other
Air/stack identification
Water/describe receptor (e.g., outfall, sewer, stream)

Soil/depth to groundwater

8 Estimate area (e.g., sq. ft., acres) affected: 6 sq ft.

9. Hazardous chemical substances released beyond BADGER property boundary, if any: None

10. Agencies notified (time, date, by whom):

Wisconsin Division of Emergency Government: Approximately 1:00 pm on 12/24/2010 by the Milwaukee Haz Mat Team.

WIDNR : On 12/27/20 at 8:49 am Kandylee Schmit left a telephone message for Mike Ellenbecker. On 12/27/2010 Kandylee Schmit left a telephone message for Sandy Miller at 9:57 am.

Milwaukee Police Department: ADT – our facility Security company contacted the police department at approximately 12:05 pm on 12/24/2010.

Milwaukee Fire Department: ADT contacted the Milwaukee Fire Department on 12/24/2010 at 12:00 pm.

11. Agencies' responses/inspections (name, time, date, comments): Larry Fox from the WIDNR contacted Kandylee Schmit on 12/27/2010 at approx. 8:15 am with questions needing clarification. Sandy Miller from the WIDNR contacted Kandylee Schmit on 12/28/2010 wanting to know how the fire started, if it was a waste stream we had accepted before, if anyone was hurt , any damage ect.

12. List the materials released in quantities that exceed the reportable quantities of 40 CFR Part 302 (CERCLA hazardous substances) or 40 CFR Part 100 (oil): N/A

13. List the materials released in quantities that exceed state reportable quantity levels:

N/A

14. Immediate corrective action taken: Drums involved in the incident were repackaged/overpacked. A local contractor was contacted to clean up the warehouse.

a) Contractor: North Shore Environmental
b) Amount of waste collected for disposal: 8 – 275 gallon totes, 1 – 55 gallon drum
c) Method/vendor/location for waste disposal: To be determined upon completion of analysis.

15. Incident damage (describe):

a) Personal injuries: None
b) Environmental damage/permit excursion(s): None
c) Property damage: None

16. Preventive measures: Badger Disposal will no longer accept this material from Rosemount Aerospace.

17. Reported to State of Wisconsin by:

Name/Title: Milwaukee Haz Mat Team
Dept.: _____ Phone number: _____
Time: Approximately 1:05 pm Time of State of Wisconsin response: 8:15 am 12/27/2010
State of Wisconsin spill notification line - (800)943-0003

INVESTIGATION:

Burned Drums:

There were four drums that were on the pallet where the fire occurred. 2 x 55 gallon drums of Waste Resin Solution WS0014373 from Rosemount Aerospace, Eagan MN, Manifest 006710565 JJK, 1 x 55 gallon drum of Waste Resin Solution WS014374 from Rosemount Aerospace, Burnsville MN, Manifest 006710546JJK, 1 x 55 gallon drum of Waste Flammable Liquids, Lab Pack profile WS024666 from HB Fuller Co. Manifest 006710550.

The 55 gallon plastic drum that reacted has a label on it identifying the generator as Rosemount Aerospace located in Eagan, MN. We have identified it as a drum from line item 1 on manifest 006710565JJK.

The profile for the drum is WS0014373, Resins/Adhesive Loosepack. The constituents on the profile reads epoxy resins, adhesives, potting compounds and sealants. Prior to arrival at Badger Disposal containers in the drum may have froze and compromised one or more of the containers. To the best of our knowledge, we believe that when the drum thawed in our warehouse a chemical reaction occurred causing a fire.

Damaged Drums:

There were 5 drums on a second pallet that were damaged by the fire, 1 x 30 gallon, 4 x 5 gallon. These were all repackaged.

Interview:

Monday 12/27/2010 am, Henry Krier contacts Mr. Jim Liesz from Bay West – the broker in St. Paul, MN that manages the waste for Rosemount Aerospace to explain what happened. He asked for their assistance in identifying exactly what could have caused the material in the drum to react and start on fire.

Amount of Waste Collected for disposal:

The clean up from the fire generated 8 – 275 gallon totes and 1 – 55 gallon drum of material. Samples were sent to Environmental Monitoring and Technologies, Inc. for analysis. The analytical results show the material to be non-regulated.

December 24, 2010 Fire Incident

Timeline:

- 12:00PM Ron Mitchell received a call from the alarm company indicating a fire alarm activation, Ron Mitchell requested that the fire department to be called.

- 12:10 Ron Mitchell received a call from alarm company that the fire department was on-site and was requesting an ETA for arrival. Ron Mitchell told the alarm company that ETA was 15 minutes and instructed the alarm company to notify the fire department to proceed with whatever measures they needed until his arrival.

- 12:25 Ron Mitchell arrives on-site. Fire Department has the north door to the warehouse open and has entered building wearing self contained breathing apparatus. Ron Mitchell makes contact with fire department and notifies them of a Badger employee being on site. Fire department personnel exit building and indicate that the fire is out due to the fact that the AFFF fire suppression system was deployed. A member of the entry team tells Ron Mitchell that the fire is contained to one pallet approximately 20 feet inside the warehouse with drums that have Aerospace written on the top of some of the involved containers. The fire department asks Ron Mitchell what the material is that was involved. Ron Mitchell produces all the manifests to the fire department from the aerospace shipment and instructs the fire department that the warehouse stores hazardous materials.

- 12:35 Fire department notifies the Haz Mat team that there is a fire involving hazardous materials and sets up a perimeter until the Haz Mat team arrives.

- 12:40 Fire department asks Ron Mitchell if the truck in the loading dock can be moved. Ron Mitchell moves truck in loading dock. Fire department asks Ron Mitchell how to open the North and East over head doors to the warehouse. Ron Mitchell instructs the fire department how to open the overhead doors. The fire department opens the overhead doors and sets up fans to clear smoke from warehouse. Ron Mitchell in contact with the fire department captain now on site.

- 1:15 Henry Krier arrives on site.

- 1:30 Fire department mobile command trailer arrives on site. Ron Mitchell provides the manifests and warehouse schematics to Haz Mat members in the command trailer and tells them the types of materials that may be involved.

- 2:00 Haz-mat team enters building and confirms that fire is out and all suppression system water and foam A hazmat member that entered the building tells the fire department captain that the drums involved have flammable stickers on the sides of the drums. The fire

department captain informs Ron Mitchell that the DNR was notified that there was a hazardous materials incident at Badger Disposal and subsequently notified that there was an isolated and contained incident.

- 2:15 Fire department allows Ron Mitchell to enter the building with proper PPE to verify the drums involved.

- 2:20 Ron Mitchell enters building and confirms the drums as containing flammable resin material from the Aerospace customer.

- 2:30 Fire department clears building for entry and Ron Mitchell, Henry Krier, and a member of the police department enter building.

- 3:00 Fire department leaves site.

- 3:30 North Shore Environmental arrives on site and begins cleanup of water and foam. All of the water and foam are vacuumed into a vacuum truck and downloaded into totes and a drum. There are 8 totes and 1 – 55 gallon drum.

- 3:40 Fire suppression company arrives on site to replace sprinkler heads and to reactivate the fire suppression system.

- 5:20 Fire suppression company completes work and reactivates system.

- 6:00 Ron Mitchell and North Shore overpack and label containers involved in the fire. The drums are palletized and isolated in the East end of the warehouse.

- 7:30 North Shore transfers water and foam into 8 totes and 1 drum. Drums and totes are labeled and placed in storage.

- 8:30 North Shore leaves site.

- 9:00 Ron Mitchell verifies site is secure and leaves site.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) 451-8346 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number MNT280010364	2. Page 1 of 2	3. Emergency Response Phone 800-[illegible]	4. Manifest Tracking Number 006710565 JJK

5. Generator's Name and Mailing Address
[illegible]OUNT AEROSPACE
1256 TRAPP ROAD
EAGAN, MN 55121
Generator's Phone: 612-892-4913

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: RAY WEST INC — U.S. EPA ID Number: MND982205437

7. Transporter 2 Company Name: Pioneer Tank Lines — U.S. EPA ID Number: MND044176113

8. Designated Facility Name and Site Address
Badger Disposal of WI, Inc.
5611 W. Hemlock St.
Milwaukee, WI 53223
Facility's Phone: 414-760-9175 — U.S. EPA ID Number: WID988580056

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, UN1866, WASTE Resin solution, flammable, 3, PG II, (D001) 2X55 DF cont 1X30DF cont WT	3	DF	650	P	~~D001~~ ~~D035~~ ~~D007~~ ~~D008~~ ~~D011~~
X	2. UN2733, WASTE Amines, flammable, corrosive, n.o.s. (Toluene, Triethylenetetramine), 3 (6), PG II 1X30DF cont	1	DF	100	P	~~D001~~ ~~D002~~
X	3. UN3264, WASTE Corrosive liquid, acidic, inorganic, n.o.s. ~~(Phosphoric acid, Ether)~~ sulfamate), 8, PG II 1X5DF cont (Chromic acid, Hydrochloric	1	DF	10	P	~~D002~~ D007
X	4. UN1993, WASTE Flammable liquids, acid nos. (Acetone, Xylene), 3, PG II 1X15DF cont	1	DF	35	P	D001

Receive As WS

14. Special Handling Instructions and Additional Information
1) ERG 127 - Resin/Adhesive Solutions
2) ERG 132 - E-1
3) ERG 154 - E-3
4) ERG 128 - E-2
J100208.2

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: JUDE T. Pikula — Signature: Jude T. Pikula — Month 12 Day 15 Year 10

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: JEFF GORDON — Signature: [signature] — Month 12 Day 15 Year 10

Transporter 2 Printed/Typed Name: MICHAEL GUEBE — Signature: Richard [signature] — Month 12 Day 17 Year 10

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
ITC01	H141	H141	H061

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a

Printed/Typed Name: Scott Zeinert — Signature: [signature] — Month 12 Day 22 Year 10

PA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

GENERATOR | TRANSPORTER | INT'L | DESIGNATED FACILITY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator ID Number: MNT 280 010 364

22. Page: 2 of 2

23. Manifest Tracking Number: 006710565 JJK

24. Generator's Name: ROSEMOUNT AEROSPACE, 1256 TRAPP RD, EAGAN, MN 55121

25. Transporter _____ Company Name — U.S. EPA ID Number

26. Transporter _____ Company Name — U.S. EPA ID Number

GENERATOR

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
X	5 UN1479, WASTE oxidizing solids, n.o.s. (Sodium dichromate), 5.1, PG II 1X5DF cont	1	DF	8	P	D001 D007
X	6 UN2810, WASTE Toxic liquids, organic, n.o.s. (Methylene chloride), 6.1, PG II 1X5DF cont	1	DF	8	P	U080
X	7 UN3265, WASTE Corrosive liquid, acidic, organic, nos (Boric acid, Citric acid), 8, PG II 1X5DF cont	1	DF	50	P	D002
X	8 UN1396, WASTE Aluminum powder, uncoated, 4.3, PG II 1X5DF cont	1	DF	5	P	D001 D003
X	9 NA2212, Asbestos, 9, PG III 1 Bags 1X14DF	1	DF	15	P	

32. Special Handling Instructions and Additional Information

5) ERG #140; E-4 6) ERG #153; E-5 7) ERG # 153; E-6
8) ERG #138; E-7 9) ERG #171; Asbestos Tiles/Debris

TRANSPORTER

33. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

34. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

35. Discrepancy

DESIGNATED

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

H141 | H141 | H141 | H141

EPA Form 8700-22A (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

5611 W. HEMLOCK STREET
MILWAUKEE, WI 53223

WS Number: _____
Approval #: _____

Badger Disposal of WI., Inc.

(414) 760-9175 1-866-271-0961 WID988580056

A.Generator Name: ROSEMOUNT AEROSPACE
Address: 1256 TRAPP ROAD
City, State, Zip: EAGAN MN 55121 SIC Code: 0000
Contact: DAN OLSON Title: _____
Telephone: (612) 892-4913 Ext. _____ FAX #: _____

Bill to: ROSEMOUNT AEROSPACE
Billing Address: 1256 TRAPP ROAD
City, State, Zip: EAGAN MN 55121
Contact: _____ Title: _____
Phone Number: (612) 892-4913 FAX #: _____

EPA ID: MNT280010364 This profile sheet was completed using: ☒ General Knowledge ☐ Analysis (attached) ☒ MSDS ☐ Both

B. WASTE DESCRIPTION AND GENERAL CHARACTERISTICS

Name of Waste: Resins/Adhesive Loosepack
Process Generating Waste: Expired or unused product
Color: Various Odor: Mild ☐ None ☒ Mild ☐ Strong ☐ Single Layer ☐ Double Layer ☒ Multi-Layer
Free Phases: ____ ☒ Liquid 50 % ☐ Powder ____ % ☒ Solid 50 % ☐ Sludge ____ %

C. RCRA AND DOT INFORMATION

Is this a USEPA Hazardous Waste? ☒ Yes ☐ No Please list the USEPA Hazardous waste codes: D001, D007, D008, D011
Is this a DOT Hazardous Material? ☒ Yes ☐ No Anticipated Annual Volume: 6-8 / Units: 55gal " "
Proper Shipping Name: Resin solution, flammable
Hazardous Class #: 3 PG #: II UN/NA #: UN1866 Additional Description: _____
Method of Shipment: ☐ Bulk Liquid ☐ Bulk Solid ☒ Drum Container Type: DF Size: 55 Gallon

D. SPECIAL HANDLING INSTRUCTIONS

If Special handling techniques are required, specify: _____
Treatment: Fuel Blend Is a representative sample provided? ☐ Yes ☒ No

E. METALS (Indicate in parts per million [ppm] if this waste contains any of the following using): ☐ TCLP ☐ Generator Knowledge ☐ TOTAL

Metal	Less than	or Actual	Metal	Less than	or Actual	Metal	Less than	or Actual
Arsenic	☐ <5 ☐ <500		Mercury	☐ <0.2 ☐ <20		Nickel	☐ <5 ☐ <134	
Barium	☐ <100		Selenium	☐ <1 ☐ <100		Thallium	☐ <5 ☐ <130	
Cadmium	☐ <1 ☐ <100		Silver	☐ <5		Zinc	☐ <5	
Chromium	☐ <5		Chromium-Hex	☐ <5 ☐ <500				
Lead	☐ <5 ☐ <500		Copper	☐ <5				

F. PHYSICAL/CHEMICAL PROPERTIES

Specific Gravity: ☐ <0.8 ☐ 0.8-1.0 ☒ 1.0-1.2 ☐ 1.2-1.4 ☐ 1.4-1.7 ☐ >1.7 Actual: _____
Total Suspended Solids: ☐ 0.5 ☐ 0.5-2.0 ☐ 2.0-5.0 ☐ 5.0-20 ☒ >20 Actual: _____
pH: ☐ <2 ☐ 2-6 ☒ 6-8 ☒ 8-10 ☐ 10-12.5 ☐ >12.5 Actual: _____
BTU's: ☐ <1 ☐ 1-4 ☐ 4-8 ☐ 8-12 ☒ 12-16 Actual: _____
Flash Point Degree F: ☒ <73°F ☐ 73-140°F ☐ >140-200°F ☐ >200°F Actual: _____
Sulfur (WT): ☒ <0.5 %☐ 0.5-2.0 ☐ 2-5 ☐ >5.0 Actual: _____

G. HAZARDOUS CHARACTERISTICS AND OTHER COMPONENTS

Reactivity: ☒ None ☐ Explosive ☐ Pyrophoric ☐ Shock Sensitive ☐ Water Reactive ☐ Etiological ☐ Radioactive ☐ Acutely Hazardous Waste
Viscosity: ☐ Low ☐ Medium ☒ High Are TC Codes present? ☐ Yes ☒ No (If yes, please list in USEPA Waste Code Section).
Halogens: ☐ ____% Chlorine ☐ ____% Fluorine ☐ ____% Bromine ☐ ____% Iodine
Cyanides (ppm) ____ PCB's (ppm) ____ Pesticides: (ppm)____ Sulfides: (ppm): ____ Phenolics: (ppm)____

H. CHEMICAL COMPOSITION (MUST TOTAL 100%)

Epoxy Resins	%		%		
Adhesives	40-60 %		%		
Potting Cmpds/Sealants	10-20 %		%		
	%		%		
	%		%		
	%		%		
	%		%		
	%		%		

y certify that all information submitted in this and all attached documents is complete and accurate, and that all known or suspected hazards have been disclosed. The ıtor further recognizes that for reasons of efficiency and speed in processing it is desirable to name Badger Disposal of WI., Inc. as Generator's agent for disposal of waste Accordingly Generator specifically authorizes office and/or employees of Badger Disposal of WI., Inc. to sign forms and/or contract in respect to waste disposal utilizing only information and matters that appear on the Badger Disposal "master sheet" above. In this respect, Badger Disposal of WI., Inc. is to in no manner change or alter the data on the above master sheet. The Generator specifically acknowledges that it has carefully reviewed the above master sheet data and information. With the above limitations, Generator further consents and directs that the officer and/or employee of Badger Disposal sign the name of the undersigned agent of Generator to any and all such forms and/or contracts respecting processing and disposal of Generator's waste.

_____

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
MND980615496	2	800-451-6346	006710546 JJK

GENERATOR

Generator's Name and Mailing Address
~~SUPERIOR AEROSPACE~~
14300 JUDICIAL ROAD
BURNSVILLE, MN 55306

Generator's Site Address (if different than mailing address)

Generator's Phone: 612-892-4300

6. Transporter 1 Company Name: BAY WEST INC — U.S. EPA ID Number: MND982205437

7. Transporter 2 Company Name: Pioneer Tank Lines — U.S. EPA ID Number: MND044176113

8. Designated Facility Name and Site Address: Badger Disposal of WI, Inc.
5611 W. Hemlock St.
Milwaukee, WI 53223

Facility's Phone: 414-760-9175 — U.S. EPA ID Number: WID988580056

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. ~~RQ, UN1866, WASTE Resin solution, flammable, 3, PG II, (D001)~~ → 1X55gal Drum 3X55 DF Cont 1X30DF cont WT	4	DF	1010	P	~~D001~~ ~~D011~~	D007	D008
X	2. UN3085, WASTE Oxidizing solid, corrosive, n.o.s. (Potassium permanganate, Sodium hydroxide), 5.1 (8), PG II 1X55DF with 30DF inside Powder	1	DF	82	P	~~D001~~		
X	3. UN3087, WASTE Oxidizing solid, toxic, n.o.s. (Chromic acid, Barium nitrate), 5.1 (6.1), PG II 1X14DF Debris	1	DF	20	P	~~D001~~	~~D007~~	~~D005~~
X	4. RQ, UN1992, WASTE Flammable liquids, toxic, n.o.s. (Xylene, Tetrachloroethylene), 3 (6.1), PG II, (D001) 1X55DF cont Receive AS WS	1	DF	170	P	~~D001~~	~~D040~~	

14. Special Handling Instructions and Additional Information
1) WS014374; Resins Loosepack DF55/30 X 4 2) Diverscale 299 DF55 X 1 ERG 140 3) Iridite 14-2 DF15 X 1 ERG 141 4) B-1 DF55 X 1 ERG 131
J100209.2

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Daniel Olson — Signature: [signature] — Month 12 Day 16 Year 10

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: JEFF GORDON — Signature: [signature] — Month 12 Day 16 Year 10

Transporter 2 Printed/Typed Name: MICHAEL GOEBEL — Signature: [signature] — Month 12 Day 17 Year 10

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H061	H141	H141	H061

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Scott Zeinert — Signature: [signature] — Month 12 Day 22 Year 10

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number	22. Page	23. Manifest Tracking Number
	MND980615496	2	006710546JJK

24. Generator's Name
ROSEMOUNT AEROSPACE
14300 JUDICIAL ROAD
BURNSVILLE, MN 55306

25. Transporter 3 Company Name — U.S. EPA ID Number

26. Transporter 4 Company Name — U.S. EPA ID Number

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes		
X	5 UN3098, WASTE Oxidizing liquid, corrosive, n.o.s. (Sodium dichromate, Chromium trioxide), 5.1, PG II 1X5DF cont	1	DF	12	P	D001	D002	D007
X	6 UN3264, WASTE Corrosive liquid, acidic, inorganic, n.o.s. (Hydrochloric acid), 8, PG II 1X15DF cont	1	DF	46	P	D002		
X	7 UN1993, WASTE Flammable liquids, n.o.s. (Methyl ethyl ketone, Acetone), 3, PG II 1X15DF cont (Received as is)	1	DF	24	P	D001	D035	
X	8 UN3287, WASTE Toxic liquid, inorganic, n.o.s. (Chromium, Nickel), 6.1, PG II 1X55DF cont	1	DF	205	P	D007		
X	9 UN2733, WASTE, Amines, Flammable, Corrosive, n.o.s. (Xylene, Triethylenetetramine) 3(8), PGII 1X30DF cont	1	DF	77	P	D001	D002	

GENERATOR

32. Special Handling Instructions and Additional Information
5) B-2 DF X 0 DF5 X 1 ERG 140 6) B-3 DF15 X 1 ERG 154 7) B-4 DF15 X 1 ERG 128 8) B-5 DF55 X 1 9) ERG # 132; B-6

TRANSPORTER

33. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

34. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

FACILITY

35. Discrepancy

DESIGNATED

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

H141	H141	H061	H141	H141

5611 W. HEMLOCK STREET
MILWAUKEE, WI 53223

WS Number: _____
Approval #: _____

'dger Disposal of WI., Inc.

(414) 760-9175 1-866-271-0961 WID988580056

A.Generator Name: ROSEMOUNT AEROSPACE
Address: 14300 JUDICIAL ROAD
City, State, Zip: BURNSVILLE MN 55306 SIC Code: NA
Contact: DAN OLSON Title: _____
Telephone: (612) 892-4300 Ext. _____ FAX #: _____
EPA ID: MND980615496

Bill to: BAY WEST INC
Billing Address: FIVE EMPIRE DRIVE
City, State, Zip: ST. PAUL MN 55103
Contact: Bay West, Inc. Title: _____
Phone Number: 651-291-3439 FAX #: (612) 291-0099

This profile sheet was completed using: ☒ General Knowledge ☐ Analysis (attached) ☒ MSDS ☐ Both

B. WASTE DESCRIPTION AND GENERAL CHARACTERISTICS

Name of Waste: Resins/Adhesive Loosepack
Process Generating Waste: Expired or unused product
Color: Various Odor: Mild ☐ None ☒ Mild ☐ Strong ☐ Single Layer ☐ Double Layer ☒ Multi-Layer
Free Phases: ____ ☒ Liquid 50 % ☐ Powder ____ % ☒ Solid 50 % ☐ Sludge ____ %

C. RCRA AND DOT INFORMATION

Is this a USEPA Hazardous Waste? ☒ Yes ☐ No Please list the USEPA Hazardous waste codes: D001, D007, D008, D011
Is this a DOT Hazardous Material? ☒ Yes ☐ No Anticipated Annual Volume: 10-12 / Units: 55gal
Proper Shipping Name: Resin solution, flammable
Hazardous Class #: 3 PG #: II UN/NA #: UN1866 Additional Description: _____
Method of Shipment: ☐ Bulk Liquid ☐ Bulk Solid ☒ Drum Container Type: DF Size: 55 Gallon

D. SPECIAL HANDLING INSTRUCTIONS

If Special handling techniques are required, specify: _____
Treatment: Fuel Blend
Is a representative sample provided? ☐ Yes ☒ No

E. METALS (Indicate in parts per million [ppm] if this waste contains any of the following using): ☐ TCLP ☐ Generator Knowledge ☐ TOTAL

Metal	Less than	or Actual	Metal	Less than	or Actual	Metal	Less than	or Actual
Arsenic	☐ <5 ☐ <500		Mercury	☐ <0.2 ☐ <20		Nickel	☐ <5 ☐ <134	
Barium	☐ <100		Selenium	☐ <1 ☐ <100		Thallium	☐ <5 ☐ <130	
Cadmium	☐ <1 ☐ <100		Silver	☐ <5		Zinc	☐ <5	
Chromium	☐ <5		Chromium-Hex	☐ <5 ☐ <500				
Lead	☐ <5 ☐ <500		Copper	☐ <5				

F. PHYSICAL/CHEMICAL PROPERTIES

Specific Gravity: ☐ <0.8 ☐ 0.8-1.0 ☒ 1.0-1.2 ☐ 1.2-1.4 ☐ 1.4-1.7 ☐ >1.7 Actual: _____
Total Suspended Solids: ☐ 0.5 ☐ 0.5-2.0 ☐ 2.0-5.0 ☐ 5.0-20 ☒ >20 Actual: _____
pH: ☐ <2 ☐ 2-6 ☒ 6-8 ☒ 8-10 ☐ 10-12.5 ☐ >12.5 Actual: _____
BTU's: ☐ <1 ☐ 1-4 ☐ 4-8 ☐ 8-12 ☒ 12-16 Actual: _____
Flash Point Degree F: ☒ <73°F ☐ 73-140°F ☐ >140-200°F ☐ >200°F Actual: _____
Sulfur (WT): ☒ <0.5 %☐ 0.5-2.0 ☐ 2-5 ☐ >5.0 Actual: _____

G. HAZARDOUS CHARACTERISTICS AND OTHER COMPONENTS

Reactivity: ☒ None ☐ Explosive ☐ Pyrophoric ☐ Shock Sensitive ☐ Water Reactive ☐ Etiological ☐ Radioactive ☐ Acutely Hazardous Waste
Viscosity: ☐ Low ☐ Medium ☒ High Are TC Codes present? ☐ Yes ☒ No (If yes, please list in USEPA Waste Code Section).
Halogens: ☐ _____% Chlorine ☐ _____% Fluorine ☐ _____% Bromine ☐ _____% Iodine
Cyanides (ppm) _____ PCB's (ppm) _____ Pesticides: (ppm)_____ Sulfides: (ppm): _____ Phenolics: (ppm)_____

I. CHEMICAL COMPOSITION (MUST TOTAL 100%)

Epoxy Resins	40-60 %		%		%
Adhesives	40-60 %		%		%
Potting Cmpds/Sealants	10-20 %		%		%
	%		%		%
	%		%		%
	%		%		%
	%		%		%
	%		%		%

I hereby certify that all information submitted in this and all attached documents is complete and accurate, and that all known or suspected hazards have been disclosed. The Generator further recognizes that for reasons of efficiency and speed in processing it is desirable to name Badger Disposal of WI., Inc. as Generator's agent for disposal of waste. Accordingly Generator specifically authorizes office and/or employees of Badger Disposal of WI., Inc. to sign forms and/or contract in respect to waste disposal utilizing only information and matters that appear on the Badger Disposal "master sheet" above. In this respect, Badger Disposal of WI., Inc. is to in no manner change or alter the data on the master sheet. The Generator specifically acknowledges that it has carefully reviewed the above master sheet data and information. With the above limitations, Generator further consents and directs that the officer and/or employee of Badger Disposal sign the name of the undersigned agent of Generator to any and all such forms and/or contracts respecting processing and disposal of Generator's waste.

EHS Coordinator 12-11-07

SIGNATURE OF GENERATOR'S OFFICER AND/OR AGENT TITLE DATE

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number: MND982426488	2. Page 1 of 2	3. Emergency Response Phone: 800-451-8346	4. Manifest Tracking Number: 006710550 JJK

5. Generator's Name and Mailing Address
Fuller Co.
.0 Lahore Road
Vadnais Heights, MN 55110
Generator's Phone: 651-236-5666

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: BAY WEST INC — U.S. EPA ID Number: MND982205437

7. Transporter 2 Company Name: Pioneer Tank Lines — U.S. EPA ID Number: MND044176113

8. Designated Facility Name and Site Address
Badger Disposal of WI, Inc.
5611 W. Hemlock St.
Milwaukee, WI 53223
Facility's Phone: 414-760-9175
U.S. EPA ID Number: WID988580056

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN1505, WASTE Sodium persulfate, 5.1, PG III	2	DF	175	P	~~D001~~
X	2. UN2811, WASTE Toxic solids, organic, n.o.s. (Thiourea), 6.1, PG II	1	DF	136	P	~~U219~~
X	3. NA3082, Hazardous waste, liquid, n.o.s. (Ammonium hydroxide, Zirconyl carbonate), 9, PG III	1	DF	35	G	
X	4. UN2811, WASTE Toxic solids, organic, n.o.s. (Acrylamide, Methyl acrylamidoglycolate methyl ether), 6.1, PG II	1	DF	100	P	~~MN01~~

14. Special Handling Instructions and Additional Information
1) Sodium persulfate DF30 X 2 ERG 140 2) Thiourea Crystals DF55 X 1 ERG 154 3) BaCote 20% DF55 X 1 ERG 171 4) Magme 100 Monomer DF30 X 1 ERG 154 J100281.1

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: [illegible] Signature: [signature] Month 12 Day 08 Year 10

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: ______ Date leaving U.S.: ______
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: JEFF GORDON Signature: [signature] Month 12 Day 8 Year 10
Transporter 2 Printed/Typed Name: MICHAEL GOEBEL Signature: [signature] Month 12 Day 17 Year 10

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. H141 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Scott Zemet Signature: [signature] Month 12 Day 27 Year 10

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. **DESIGNATED FACILITY'S COPY**

Print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number	22. Page	23. Manifest Tracking Number
	MND983426488	2	006710550JJK

24. Generator's Name
B Fuller Co.
450 Labore Road
Vadnais Heights, MN 55110

25. Transporter 3 Company Name — U.S. EPA ID Number

26. Transporter 4 Company Name — U.S. EPA ID Number

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes		
X	5 UN3110, WASTE Organic peroxide type F, solid, n.o.s. (Di-cumyl peroxide), 5.2, PG II	1	DF	4	P	D001	D003	
X	6 UN1993, WASTE Flammable liquids, n.o.s. (Petroleum distillates), 3, PG II 1x55gal Drum	1	DF	209	P	D001		

32. Special Handling Instructions and Additional Information
5) B-10 DF5 X 1 ERG 145 6) B-7 DF55 X 1 ERG 128 WS024666
24666

GENERATOR

33. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

34. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

TRANSPORTER

35. Discrepancy

FACILITY

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
H141 | H061

DESIGN

EPA Form 8700-22A (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY'S COPY

Badger

LAB PACK – DRUM INVENTORY

Generator Name HB Fuller # _____
Generator EPA ID # _____ Drum # H-7
Date Accumulation Began _____ Container Type Poly
Date Accumulation Closed _____ Container Size 55
DOT Proper Shipping Name Flammable liquids, nos
DOT Hazard Class 3 DOT ID # UN1993
ERG # 128 Weight (drum & contents) 209 lbs.

EPA Waste Code	Chemical(s)	Number of Containers	Container Size	Type	Physical State
[redacted]	organosilicone Fluid	2	5gal	M	L
	1-dodecanethiol	2	4L	G	L
	BETA-(3,4-Epoxycyclohexyl)-Ethyltrimethoxysilane	2	1gal	M	L
D001	vinyl DA (Petroleum Dist. Hates)	1	5gal	M	L
[redacted]	Jet Fuel	2	1gal	M	L
	[redacted]				

G = Glass M = Metal P = Polyethylene F = Fiber
L = Liquid S = Solid A = Aerosol R = Residue (sludge)

DOCS # 48245

Badger Disposal Load Summary Sheet

Manifest: 006710550 JJK			Date Received: 12-22-10	
Generator: HB Fuller Co.				
	Line 1	Line 2	Line 3	Line 4
Waste Stream #				
Qty Rcvd	2	1	1	1
Size	30DF	55DF	55DF	30DF
Overpack				
Gaylords				
Sampled				
Liq			✓	
PSA				
PSB				
Ink Paste				
NPS				
Rags				
Debris				
Containers		✓		
Soil				
Filter Cake				
Powder	✓			✓
Sludge				
Metal filings				
Granules				
Matches the identity specified on manifest and waste profile sheet.	✓	✓	✓	✓
pH check				
Drum #'s	199268-69	199270	199271	199272
Weights				

Badger Disposal Load Summary Sheet

Manifest: 006710550JJK	Date Received: 12-22-10

Generator: HB Fuller Co.

	Line 1	Line 2	Line 3	Line 4
Waste Stream #				
Qty Rcvd	1	1		
Size	55DF	55DF		
Overpack				
Gaylords				
Sampled				
Liq				
PSA				
PSB				
Ink Paste				
NPS				
Rags				
Debris				
Containers	✓	✓		
Soil				
Filter Cake				
Powder				
Sludge				
Metal filings				
Granules				
Matches the identity specified on manifest and waste profile sheet.	✓	✓		
pH check				
Drum #'s	199273	199274		
Weights				

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203

847-967-6666
FAX: 847-967-6735
www.emt.com

Chain of Custody Record

TURNAROUND TIME:
☐ RUSH
_____ day turnaround
☐ ROUTINE

Due Date: ____-____-____ COC #: 038806

Company: Badger Disposal of WI
Address:
Phone #: (____) ____-______ Fax #: (____) ____-______
P.O. #: ______ Proj. #: ______-____
Client Contact:
Project ID / Location:

Sample Type: 1. Waste Water 2. Drinking Water 3. Soil 4. Sludge 5. Oil 6. Groundwater 7. Groundwater (filtered) 8. Other

Container Type: P - Plastic V - VOC Vial O - Other G - Glass B - Tedlar Bag

Preservative: 1. None 2. H_2SO_4 3. HNO_3 4. NaOH 5. HCl 6. MeOH 7. Zn Ace 8. Other

Analyses

Sample I.D.	Sample Type	Container Size	Container Type	Container No.	Sampling By	Sampling Date	Sampling Time	Sampling pH	Sampling Temp.	Preservation Field	Preservation Lab	TCLP RCRA Metals	Total RCRA	VOC	SVOC	EMT USE ONLY EMT WORKORDER #10120609
CAT-1	8	1 Qt	G	1								X				1A
BDW-1	8	1 Qt	G	1									X	X	X	2A
BDW-2	8	1 Qt	G	1									X	X	X	3A
BDW-3	8	1 Qt	G	1									X	X	X	4A
BDW-4	8	1 Qt	G	1									X	X	X	5A
BDW-5	8	1 Qt	G	1									X	X	X	6A

Relinquished By:	Date / Time	Received By:	Date / Time
[signature]	Date: 12-28-10 Time: 10:17am	[signature]	Date: 12-28-10 Time: 10:17
[signature]	Date: 12-28-10 Time: 10:35	Jon Daly	Date: 12-28-10 Time: 10:35
Jon Daly	Date: 12-28-10 Time: 1600	Received For Lab By: [signature]	Date: 12-28-10 Time: 16:00

EMT USE ONLY
Client Code: BADGER
EMT Project I.D.
Jar Lot No.

☒ SAMPLE RECEIVED ON ICE
☒ TEMPERATURE (Must be recorded if sampling was greater than 6 hrs. prior to sample receipt) 6°

EMT SAMPLE RETURN POLICY ON BACK

SPECIAL INSTRUCTIONS:

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin • Morton Grove, IL 60053-3203
847.967.6660 • 800.346.0660 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT:	Badger Disposal of Wisconsin	**Client Sample ID:**	BDW-1
Lab Order:	10120609	**Report Date:**	1/6/2011
Project:	Sample analysis	**Collection Date:**	12/28/2010
Lab ID:	10120609-02	**Matrix:**	Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
ICP Metals, Groundwater Total		**Method:**		**SW6010C / SW3015**					
Arsenic	0.055	0.1	J	mg/L	0.0136	12/29/10 11:31	63206	1.00	AG
Barium	0.414	0.1		mg/L	0.00540	12/29/10 11:31	63206	1.00	AG
Cadmium	0.016	0.1	J	mg/L	0.00560	12/29/10 11:31	63206	1.00	AG
Chromium	0.333	0.1		mg/L	0.00680	12/29/10 11:31	63206	1.00	AG
Lead	0.194	0.1		mg/L	0.00920	12/29/10 11:31	63206	1.00	AG
Selenium	0.036	0.1	J	mg/L	0.0304	12/29/10 11:31	63206	1.00	AG
Silver	< 0.1	0.1		mg/L	0.0234	12/29/10 11:31	63206	1.00	AG
Mercury, Total		**Method:**		**SW7470A / HG PREP**					
Mercury	0.0072	0.0005		mg/L	0.000192	12/29/10	63214	1.00	IG
Semivolatile Organic Compounds GC/MS		**Method:**		**SW8270D / SW3510C**					
1,2,4-Trichlorobenzene	< 147.	147.		µg/L	52.9	1/4/11 13:51	63236	1.00	MG3
1,2-Dichlorobenzene	< 147.	147.		µg/L	41.2	1/4/11 13:51	63236	1.00	MG3
1,3-Dichlorobenzene	< 147.	147.		µg/L	39.7	1/4/11 13:51	63236	1.00	MG3
1,4-Dichlorobenzene	< 147.	147.		µg/L	54.4	1/4/11 13:51	63236	1.00	MG3
2,4,5-Trichlorophenol	< 1580.	1580.		µg/L	525	1/4/11 13:51	63236	1.00	MG3
2,4,6-Trichlorophenol	< 1600.	1600.		µg/L	532	1/4/11 13:51	63236	1.00	MG3
2,4-Dichlorophenol	< 1690.	1690.		µg/L	562	1/4/11 13:51	63236	1.00	MG3
2,4-Dimethylphenol	< 2120.	2120.		µg/L	707	1/4/11 13:51	63236	1.00	MG3
2,4-Dinitrophenol	< 11900.	11900.		µg/L	3,950	1/4/11 13:51	63236	1.00	MG3
2,4-Dinitrotoluene	< 3680.	3680.		µg/L	444	1/4/11 13:51	63236	1.00	MG3
2,6-Dinitrotoluene	< 2180.	2180.		µg/L	726	1/4/11 13:51	63236	1.00	MG3
2-Chloronaphthalene	< 147.	147.		µg/L	72.1	1/4/11 13:51	63236	1.00	MG3
2-Chlorophenol	< 1190.	1190.		µg/L	396	1/4/11 13:51	63236	1.00	MG3
3,3'-Dichlorobenzidine	< 1470.	1470.		µg/L	293	1/4/11 13:51	63236	1.00	MG3
3-Nitroaniline	< 1470.	1470.		µg/L	293	1/4/11 13:51	63236	1.00	MG3
4,6-Dinitro-2-methylphenol	< 7350.	7350.		µg/L	921	1/4/11 13:51	63236	1.00	MG3
4-Bromophenyl phenyl ether	< 147.	147.		µg/L	66.2	1/4/11 13:51	63236	1.00	MG3
4-Chloro-3-methylphenol	< 1350.	1350.		µg/L	450	1/4/11 13:51	63236	1.00	MG3
4-Chloroaniline	< 147.	147.		µg/L	60.3	1/4/11 13:51	63236	1.00	MG3
4-Chlorophenyl phenyl ether	< 147.	147.		µg/L	38.2	1/4/11 13:51	63236	1.00	MG3
4-Nitrophenol	< 3680.	3680.		µg/L	579	1/4/11 13:51	63236	1.00	MG3

Qualifiers:

B - Analyte detected in the associated Method Blank

E - Estimated

H - Holding Time Exceeded

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

3100 North Austin • Morton Grove, IL 60053-3203
847.967.9666 • 800.248.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT: Badger Disposal of Wisconsin
Lab Order: 10120609
Project: Sample analysis
Lab ID: 10120609-02

Client Sample ID: BDW-1
Report Date: 1/6/2011
Collection Date: 12/28/2010
Matrix: Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
Acenaphthene	< 147.	147.		µg/L	45.6	1/4/11 13:51	63236	1.00	MG3
Acenaphthylene	< 147.	147.		µg/L	45.6	1/4/11 13:51	63236	1.00	MG3
Anthracene	< 147.	147.		µg/L	41.2	1/4/11 13:51	63236	1.00	MG3
Azobenzene as 1,2-Diphenylhydrazine	< 147.	147.		µg/L	51.5	1/4/11 13:51	63236	1.00	MG3
Benz(a)anthracene	< 147.	147.		µg/L	52.9	1/4/11 13:51	63236	1.00	MG3
Benzidine	< 4570.	4570.		µg/L	1,520	1/4/11 13:51	63236	1.00	MG3
Benzo(a)pyrene	< 3680.	3680.		µg/L	52.9	1/4/11 13:51	63236	1.00	MG3
Benzo(b)fluoranthene	< 147.	147.		µg/L	55.9	1/4/11 13:51	63236	1.00	MG3
Benzo(g,h,i)perylene	< 3680.	3680.		µg/L	58.8	1/4/11 13:51	63236	1.00	MG3
Benzo(k)fluoranthene	< 147.	147.		µg/L	64.7	1/4/11 13:51	63236	1.00	MG3
Bis(2-chloroethoxy)methane	< 926.	926.		µg/L	309	1/4/11 13:51	63236	1.00	MG3
Bis(2-chloroethyl)ether	< 147.	147.		µg/L	64.7	1/4/11 13:51	63236	1.00	MG3
Bis(2-chloroisopropyl)ether	< 147.	147.		µg/L	128	1/4/11 13:51	63236	1.00	MG3
Bis(2-ethylhexyl)phthalate	250.	7350.	J	µg/L	124	1/4/11 13:51	63236	1.00	MG3
Butyl benzyl phthalate	< 1470.	1470.		µg/L	485	1/4/11 13:51	63236	1.00	MG3
Carbazole	< 1180.	1180.		µg/L	394	1/4/11 13:51	63236	1.00	MG3
Chrysene	< 147.	147.		µg/L	66.2	1/4/11 13:51	63236	1.00	MG3
Di-n-butyl phthalate	< 3680.	3680.		µg/L	32.4	1/4/11 13:51	63236	1.00	MG3
Di-n-octyl phthalate	< 3680.	3680.		µg/L	76.5	1/4/11 13:51	63236	1.00	MG3
Dibenz(a,h)anthracene	< 3680.	3680.		µg/L	70.6	1/4/11 13:51	63236	1.00	MG3
Diethyl phthalate	< 147.	147.		µg/L	54.4	1/4/11 13:51	63236	1.00	MG3
Dimethyl phthalate	< 147.	147.		µg/L	72.1	1/4/11 13:51	63236	1.00	MG3
Fluoranthene	< 147.	147.		µg/L	51.5	1/4/11 13:51	63236	1.00	MG3
Fluorene	< 147.	147.		µg/L	63.2	1/4/11 13:51	63236	1.00	MG3
Hexachlorobenzene	< 147.	147.		µg/L	54.4	1/4/11 13:51	63236	1.00	MG3
Hexachlorobutadiene	< 147.	147.		µg/L	60.3	1/4/11 13:51	63236	1.00	MG3
Hexachlorocyclopentadiene	< 1760.	1760.		µg/L	585	1/4/11 13:51	63236	1.00	MG3
Hexachloroethane	< 147.	147.		µg/L	70.6	1/4/11 13:51	63236	1.00	MG3
Indeno(1,2,3-cd)pyrene	< 7350.	7350.		µg/L	50.0	1/4/11 13:51	63236	1.00	MG3
Isophorone	< 147.	147.		µg/L	63.2	1/4/11 13:51	63236	1.00	MG3
m,p-Cresol	< 1780.	1780.		µg/L	593	1/4/11 13:51	63236	1.00	MG3
N-Nitrosodi-n-propylamine	< 147.	147.		µg/L	128	1/4/11 13:51	63236	1.00	MG3

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.249.0563 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT:	Badger Disposal of Wisconsin	**Client Sample ID:**	BDW-1
Lab Order:	10120609	**Report Date:**	1/6/2011
Project:	Sample analysis	**Collection Date:**	12/28/2010
Lab ID:	10120609-02	**Matrix:**	Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
N-Nitrosodimethylamine	< 147.	147.		µg/L	64.7	1/4/11 13:51	63236	1.00	MG3
N-Nitrosodiphenylamine	< 147.	147.		µg/L	44.1	1/4/11 13:51	63236	1.00	MG3
Naphthalene	< 147.	147.		µg/L	60.3	1/4/11 13:51	63236	1.00	MG3
Nitrobenzene	< 147.	147.		µg/L	119	1/4/11 13:51	63236	1.00	MG3
o-Cresol	< 1840.	1840.		µg/L	612	1/4/11 13:51	63236	1.00	MG3
Pentachlorophenol	< 3680.	3680.		µg/L	438	1/4/11 13:51	63236	1.00	MG3
Phenanthrene	< 147.	147.		µg/L	39.7	1/4/11 13:51	63236	1.00	MG3
Phenol	< 1240.	1240.		µg/L	413	1/4/11 13:51	63236	1.00	MG3
Pyrene	< 147.	147.		µg/L	63.2	1/4/11 13:51	63236	1.00	MG3
Surrogates:									
2,4,6-Tribromophenol	72.2	5-139		%REC	0	1/4/11 13:51	63236	1.00	MG3
2-Fluorobiphenyl	73.1	5-122		%REC	0	1/4/11 13:51	63236	1.00	MG3
2-Fluorophenol	56.3	5-92.5		%REC	0	1/4/11 13:51	63236	1.00	MG3
4-Terphenyl-d14	100	14.4-90.6	S	%REC	0	1/4/11 13:51	63236	1.00	MG3
Nitrobenzene-d5	65.8	5-110		%REC	0	1/4/11 13:51	63236	1.00	MG3
Phenol-d5	68.2	5-72.9		%REC	0	1/4/11 13:51	63236	1.00	MG3
Volatile Organic Compounds by GC/MS		**Method:**		**SW8260B / SW5030A**					
1,1,1-Trichloroethane	< 20.	20.		µg/L	3.50	12/29/10 16:09	63222	1.00	XN
1,1,2,2-Tetrachloroethane	< 20.	20.		µg/L	4.06	12/29/10 16:09	63222	1.00	XN
1,1,2-Trichloroethane	< 20.	20.		µg/L	2.20	12/29/10 16:09	63222	1.00	XN
1,1-Dichloroethane	< 20.	20.		µg/L	3.20	12/29/10 16:09	63222	1.00	XN
1,1-Dichloroethene	< 20.	20.		µg/L	7.50	12/29/10 16:09	63222	1.00	XN
1,2-Dibromo-3-chloropropane	< 20.	20.		µg/L	10.0	12/29/10 16:09	63222	1.00	XN
1,2-Dibromoethane	< 20.	20.		µg/L	2.60	12/29/10 16:09	63222	1.00	XN
1,2-Dichloroethane	94.2	20.		µg/L	2.00	12/29/10 16:09	63222	1.00	XN
1,2-Dichloropropane	< 20.	20.		µg/L	2.20	12/29/10 16:09	63222	1.00	XN
1-Butanol	910.	1000.	J	µg/L	254	12/29/10 16:09	63222	1.00	XN
2-Butanone	555.	200.		µg/L	23.0	12/29/10 16:09	63222	1.00	XN
2-Hexanone	< 200.	200.		µg/L	10.1	12/29/10 16:09	63222	1.00	XN
4-Methyl-2-pentanone	150.	200.	J	µg/L	25.7	12/29/10 16:09	63222	1.00	XN
Acetone	1080.	400.		µg/L	42.8	12/29/10 16:09	63222	1.00	XN
Acrylonitrile	< 200.	200.		µg/L	36.7	12/29/10 16:09	63222	1.00	XN
Benzene	5.	20.	J	µg/L	2.00	12/29/10 16:09	63222	1.00	XN

Qualifiers:

B - Analyte detected in the associated Method Blank

E - Estimated

H - Holding Time Exceeded

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

J - Analyte detected below quantitation limits

ENVIRONMENTAL
MONITORING AND
TECHNOLOGIES, INC.

3100 North Austin • Morton Grove, IL 60053-3203
847.967.6668 • 800.348.0663 • fax: 847.967.6736 • www.emt.com

Report of Laboratory Analysis

CLIENT: Badger Disposal of Wisconsin
Lab Order: 10120609
Project: Sample analysis
Lab ID: 10120609-02

Client Sample ID: BDW-1
Report Date: 1/6/2011
Collection Date: 12/28/2010
Matrix: Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
Bromodichloromethane	< 20.	20.		µg/L	2.00	12/29/10 16:09	63222	1.00	XN
Bromoform	197.	20.		µg/L	6.70	12/29/10 16:09	63222	1.00	XN
Bromomethane	< 20.	20.		µg/L	2.30	12/29/10 16:09	63222	1.00	XN
Carbon disulfide	< 20.	20.		µg/L	4.10	12/29/10 16:09	63222	1.00	XN
Carbon tetrachloride	< 20.	20.		µg/L	3.30	12/29/10 16:09	63222	1.00	XN
Chlorobenzene	< 20.	20.		µg/L	1.90	12/29/10 16:09	63222	1.00	XN
Chloroethane	< 20.	20.		µg/L	5.00	12/29/10 16:09	63222	1.00	XN
Chloroform	1250.	20.		µg/L	2.35	12/29/10 16:09	63222	1.00	XN
Chloromethane	< 20.	20.		µg/L	2.93	12/29/10 16:09	63222	1.00	XN
cis-1,2-Dichloroethene	< 20.	20.		µg/L	3.80	12/29/10 16:09	63222	1.00	XN
Dibromochloromethane	< 20.	20.		µg/L	2.65	12/29/10 16:09	63222	1.00	XN
Ethylbenzene	17.	20.	J	µg/L	1.50	12/29/10 16:09	63222	1.00	XN
m,p-Xylene	97.5	40.		µg/L	2.80	12/29/10 16:09	63222	1.00	XN
Methyl tert-butyl ether	< 20.	20.		µg/L	2.40	12/29/10 16:09	63222	1.00	XN
Methylene chloride	97.1	20.		µg/L	2.91	12/29/10 16:09	63222	1.00	XN
o-Xylene	55.7	20.		µg/L	2.00	12/29/10 16:09	63222	1.00	XN
Styrene	10.	20.	J	µg/L	2.60	12/29/10 16:09	63222	1.00	XN
Tetrachloroethene	< 20.	20.		µg/L	4.40	12/29/10 16:09	63222	1.00	XN
Toluene	25.6	20.		µg/L	2.17	12/29/10 16:09	63222	1.00	XN
trans-1,2-Dichloroethene	< 20.	20.		µg/L	3.10	12/29/10 16:09	63222	1.00	XN
Trichloroethene	< 20.	20.		µg/L	2.93	12/29/10 16:09	63222	1.00	XN
Vinyl acetate	< 20.	20.		µg/L	2.10	12/29/10 16:09	63222	1.00	XN
Vinyl chloride	< 20.	20.		µg/L	4.40	12/29/10 16:09	63222	1.00	XN
1,3-Dichloropropene, Total	< 40.	40.		µg/L	3.80	12/29/10 16:09	63222	1.00	XN
Xylenes, Total	153.	60.		µg/L	6.00	12/29/10 16:09	63222	1.00	XN
Surrogates:									
1,2-Dichloroethane-d4	153	72-146	S	%REC	10.0	12/29/10 16:09	63222	1.00	XN
4-Bromofluorobenzene	119	60-126		%REC	10.0	12/29/10 16:09	63222	1.00	XN
d4-1,2-Dichlorobenzene	122	54-121	S	%REC	10.0	12/29/10 16:09	63222	1.00	XN
Dibromofluoromethane	111	60-126		%REC	10.0	12/29/10 16:09	63222	1.00	XN
Fluorobenzene	98.0	65-139		%REC	10.0	12/29/10 16:09	63222	1.00	XN
Toluene-d8	100	62-135		%REC	10.0	12/29/10 16:09	63222	1.00	XN

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.246.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT: Badger Disposal of Wisconsin
Lab Order: 10120609
Project: Sample analysis
Lab ID: 10120609-03

Client Sample ID: BDW-2
Report Date: 1/6/2011
Collection Date: 12/28/2010
Matrix: Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
ICP Metals, Groundwater Total		**Method:**		**SW6010C / SW3015**					
Arsenic	0.06	0.1	J	mg/L	0.0136	12/29/10 11:31	63206	1.00	AG
Barium	0.47	0.1		mg/L	0.00540	12/29/10 11:31	63206	1.00	AG
Cadmium	0.016	0.1	J	mg/L	0.00560	12/29/10 11:31	63206	1.00	AG
Chromium	0.351	0.1		mg/L	0.00680	12/29/10 11:31	63206	1.00	AG
Lead	0.177	0.1		mg/L	0.00920	12/29/10 11:31	63206	1.00	AG
Selenium	< 0.1	0.1		mg/L	0.0304	12/29/10 11:31	63206	1.00	AG
Silver	< 0.1	0.1		mg/L	0.0234	12/29/10 11:31	63206	1.00	AG
Mercury, Total		**Method:**		**SW7470A / HG PREP**					
Mercury	0.0061	0.0005		mg/L	0.000192	12/29/10	63214	1.00	IG
Semivolatile Organic Compounds GC/MS		**Method:**		**SW8270D / SW3510C**					
1,2,4-Trichlorobenzene	< 133.	133.		µg/L	47.7	1/4/11 14:35	63236	1.00	MG3
1,2-Dichlorobenzene	< 133.	133.		µg/L	37.1	1/4/11 14:35	63236	1.00	MG3
1,3-Dichlorobenzene	< 133.	133.		µg/L	35.8	1/4/11 14:35	63236	1.00	MG3
1,4-Dichlorobenzene	< 133.	133.		µg/L	49.1	1/4/11 14:35	63236	1.00	MG3
2,4,5-Trichlorophenol	< 1420.	1420.		µg/L	473	1/4/11 14:35	63236	1.00	MG3
2,4,6-Trichlorophenol	< 1440.	1440.		µg/L	480	1/4/11 14:35	63236	1.00	MG3
2,4-Dichlorophenol	< 1520.	1520.		µg/L	506	1/4/11 14:35	63236	1.00	MG3
2,4-Dimethylphenol	< 1910.	1910.		µg/L	638	1/4/11 14:35	63236	1.00	MG3
2,4-Dinitrophenol	< 10700.	10700.		µg/L	3,560	1/4/11 14:35	63236	1.00	MG3
2,4-Dinitrotoluene	< 3310.	3310.		µg/L	400	1/4/11 14:35	63236	1.00	MG3
2,6-Dinitrotoluene	< 1960.	1960.		µg/L	655	1/4/11 14:35	63236	1.00	MG3
2-Chloronaphthalene	< 133.	133.		µg/L	65.0	1/4/11 14:35	63236	1.00	MG3
2-Chlorophenol	< 1070.	1070.		µg/L	357	1/4/11 14:35	63236	1.00	MG3
3,3'-Dichlorobenzidine	< 1330.	1330.		µg/L	264	1/4/11 14:35	63236	1.00	MG3
3-Nitroaniline	< 1330.	1330.		µg/L	264	1/4/11 14:35	63236	1.00	MG3
4,6-Dinitro-2-methylphenol	< 6630.	6630.		µg/L	830	1/4/11 14:35	63236	1.00	MG3
4-Bromophenyl phenyl ether	< 133.	133.		µg/L	59.7	1/4/11 14:35	63236	1.00	MG3
4-Chloro-3-methylphenol	< 1220.	1220.		µg/L	406	1/4/11 14:35	63236	1.00	MG3
4-Chloroaniline	< 133.	133.		µg/L	54.4	1/4/11 14:35	63236	1.00	MG3
4-Chlorophenyl phenyl ether	< 133.	133.		µg/L	34.5	1/4/11 14:35	63236	1.00	MG3
4-Nitrophenol	< 3310.	3310.		µg/L	522	1/4/11 14:35	63236	1.00	MG3

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

5100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.246.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT:	Badger Disposal of Wisconsin	**Client Sample ID:**	BDW-2
Lab Order:	10120609	**Report Date:**	1/6/2011
Project:	Sample analysis	**Collection Date:**	12/28/2010
Lab ID:	10120609-03	**Matrix:**	Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
Acenaphthene	< 133.	133.		µg/L	41.1	1/4/11 14:35	63236	1.00	MG3
Acenaphthylene	< 133.	133.		µg/L	41.1	1/4/11 14:35	63236	1.00	MG3
Anthracene	< 133.	133.		µg/L	37.1	1/4/11 14:35	63236	1.00	MG3
Azobenzene as 1,2-Diphenylhydrazine	< 133.	133.		µg/L	46.4	1/4/11 14:35	63236	1.00	MG3
Benz(a)anthracene	< 133.	133.		µg/L	47.7	1/4/11 14:35	63236	1.00	MG3
Benzidine	< 4120.	4120.		µg/L	1,370	1/4/11 14:35	63236	1.00	MG3
Benzo(a)pyrene	< 3310.	3310.		µg/L	47.7	1/4/11 14:35	63236	1.00	MG3
Benzo(b)fluoranthene	< 133.	133.		µg/L	50.4	1/4/11 14:35	63236	1.00	MG3
Benzo(g,h,i)perylene	< 3310.	3310.		µg/L	53.0	1/4/11 14:35	63236	1.00	MG3
Benzo(k)fluoranthene	< 133.	133.		µg/L	58.3	1/4/11 14:35	63236	1.00	MG3
Bis(2-chloroethoxy)methane	< 835.	835.		µg/L	278	1/4/11 14:35	63236	1.00	MG3
Bis(2-chloroethyl)ether	< 133.	133.		µg/L	58.3	1/4/11 14:35	63236	1.00	MG3
Bis(2-chloroisopropyl)ether	< 133.	133.		µg/L	115	1/4/11 14:35	63236	1.00	MG3
Bis(2-ethylhexyl)phthalate	340.	6630.	J	µg/L	111	1/4/11 14:35	63236	1.00	MG3
Butyl benzyl phthalate	< 1330.	1330.		µg/L	437	1/4/11 14:35	63236	1.00	MG3
Carbazole	< 1070.	1070.		µg/L	355	1/4/11 14:35	63236	1.00	MG3
Chrysene	< 133.	133.		µg/L	59.7	1/4/11 14:35	63236	1.00	MG3
Di-n-butyl phthalate	< 3310.	3310.		µg/L	29.2	1/4/11 14:35	63236	1.00	MG3
Di-n-octyl phthalate	< 3310.	3310.		µg/L	68.9	1/4/11 14:35	63236	1.00	MG3
Dibenz(a,h)anthracene	< 3310.	3310.		µg/L	63.6	1/4/11 14:35	63236	1.00	MG3
Diethyl phthalate	< 133.	133.		µg/L	49.1	1/4/11 14:35	63236	1.00	MG3
Dimethyl phthalate	< 133.	133.		µg/L	65.0	1/4/11 14:35	63236	1.00	MG3
Fluoranthene	< 133.	133.		µg/L	46.4	1/4/11 14:35	63236	1.00	MG3
Fluorene	< 133.	133.		µg/L	57.0	1/4/11 14:35	63236	1.00	MG3
Hexachlorobenzene	< 133.	133.		µg/L	49.1	1/4/11 14:35	63236	1.00	MG3
Hexachlorobutadiene	< 133.	133.		µg/L	54.4	1/4/11 14:35	63236	1.00	MG3
Hexachlorocyclopentadiene	< 1580.	1580.		µg/L	528	1/4/11 14:35	63236	1.00	MG3
Hexachloroethane	< 133.	133.		µg/L	63.6	1/4/11 14:35	63236	1.00	MG3
Indeno(1,2,3-cd)pyrene	< 6630.	6630.		µg/L	45.1	1/4/11 14:35	63236	1.00	MG3
Isophorone	< 133.	133.		µg/L	57.0	1/4/11 14:35	63236	1.00	MG3
m,p-Cresol	< 1600.	1600.		µg/L	534	1/4/11 14:35	63236	1.00	MG3
N-Nitrosodi-n-propylamine	< 133.	133.		µg/L	115	1/4/11 14:35	63236	1.00	MG3

Qualifiers:

B - Analyte detected in the associated Method Blank

E - Estimated

H - Holding Time Exceeded

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

5100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.246.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT:	Badger Disposal of Wisconsin	**Client Sample ID:**	BDW-2
Lab Order:	10120609	**Report Date:**	1/6/2011
Project:	Sample analysis	**Collection Date:**	12/28/2010
Lab ID:	10120609-03	**Matrix:**	Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
N-Nitrosodimethylamine	< 133.	133.		µg/L	58.3	1/4/11 14:35	63236	1.00	MG3
N-Nitrosodiphenylamine	< 133.	133.		µg/L	39.8	1/4/11 14:35	63236	1.00	MG3
Naphthalene	< 133.	133.		µg/L	54.4	1/4/11 14:35	63236	1.00	MG3
Nitrobenzene	< 133.	133.		µg/L	107	1/4/11 14:35	63236	1.00	MG3
o-Cresol	< 1650.	1650.		µg/L	552	1/4/11 14:35	63236	1.00	MG3
Pentachlorophenol	< 3310.	3310.		µg/L	395	1/4/11 14:35	63236	1.00	MG3
Phenanthrene	< 133.	133.		µg/L	35.8	1/4/11 14:35	63236	1.00	MG3
Phenol	< 1120.	1120.		µg/L	373	1/4/11 14:35	63236	1.00	MG3
Pyrene	< 133.	133.		µg/L	57.0	1/4/11 14:35	63236	1.00	MG3
Surrogates:									
2,4,6-Tribromophenol	79.2	5-139		%REC	0	1/4/11 14:35	63236	1.00	MG3
2-Fluorobiphenyl	58.1	5-122		%REC	0	1/4/11 14:35	63236	1.00	MG3
2-Fluorophenol	35.5	5-92.5		%REC	0	1/4/11 14:35	63236	1.00	MG3
4-Terphenyl-d14	111	14.4-90.6	S	%REC	0	1/4/11 14:35	63236	1.00	MG3
Nitrobenzene-d5	50.0	5-110		%REC	0	1/4/11 14:35	63236	1.00	MG3
Phenol-d5	60.1	5-72.9		%REC	0	1/4/11 14:35	63236	1.00	MG3
Volatile Organic Compounds by GC/MS		**Method:**		**SW8260B / SW5030A**					
1,1,1-Trichloroethane	< 100.	100.		µg/L	17.5	12/29/10 08:57	63210	1.00	XN
1,1,2,2-Tetrachloroethane	< 100.	100.		µg/L	20.3	12/29/10 08:57	63210	1.00	XN
1,1,2-Trichloroethane	< 100.	100.		µg/L	11.0	12/29/10 08:57	63210	1.00	XN
1,1-Dichloroethane	< 100.	100.		µg/L	16.0	12/29/10 08:57	63210	1.00	XN
1,1-Dichloroethene	< 100.	100.		µg/L	37.5	12/29/10 08:57	63210	1.00	XN
1,2-Dibromo-3-chloropropane	< 100.	100.		µg/L	50.0	12/29/10 08:57	63210	1.00	XN
1,2-Dibromoethane	< 100.	100.		µg/L	13.0	12/29/10 08:57	63210	1.00	XN
1,2-Dichloroethane	97.	100.	J	µg/L	10.0	12/29/10 08:57	63210	1.00	XN
1,2-Dichloropropane	< 100.	100.		µg/L	11.0	12/29/10 08:57	63210	1.00	XN
1-Butanol	3200.	5000.	J	µg/L	1,270	12/29/10 08:57	63210	1.00	XN
2-Butanone	520.	1000.	J	µg/L	115	12/29/10 08:57	63210	1.00	XN
2-Hexanone	< 1000.	1000.		µg/L	50.5	12/29/10 08:57	63210	1.00	XN
4-Methyl-2-pentanone	< 1000.	1000.		µg/L	128	12/29/10 08:57	63210	1.00	XN
Acetone	480.	2000.	J	µg/L	214	12/29/10 08:57	63210	1.00	XN
Acrylonitrile	< 1000.	1000.		µg/L	184	12/29/10 08:57	63210	1.00	XN
Benzene	< 100.	100.		µg/L	10.0	12/29/10 08:57	63210	1.00	XN

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.246.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT:	Badger Disposal of Wisconsin	**Client Sample ID:**	BDW-2
Lab Order:	10120609	**Report Date:**	1/6/2011
Project:	Sample analysis	**Collection Date:**	12/28/2010
Lab ID:	10120609-03	**Matrix:**	Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
Bromodichloromethane	< 100.	100.		µg/L	10.0	12/29/10 08:57	63210	1.00	XN
Bromoform	187.	100.		µg/L	33.5	12/29/10 08:57	63210	1.00	XN
Bromomethane	< 100.	100.		µg/L	11.5	12/29/10 08:57	63210	1.00	XN
Carbon disulfide	< 100.	100.		µg/L	20.5	12/29/10 08:57	63210	1.00	XN
Carbon tetrachloride	< 100.	100.		µg/L	16.5	12/29/10 08:57	63210	1.00	XN
Chlorobenzene	< 100.	100.		µg/L	9.50	12/29/10 08:57	63210	1.00	XN
Chloroethane	< 100.	100.		µg/L	25.0	12/29/10 08:57	63210	1.00	XN
Chloroform	1630.	100.		µg/L	11.7	12/29/10 08:57	63210	1.00	XN
Chloromethane	< 100.	100.		µg/L	14.6	12/29/10 08:57	63210	1.00	XN
cis-1,2-Dichloroethene	< 100.	100.		µg/L	19.0	12/29/10 08:57	63210	1.00	XN
Dibromochloromethane	< 100.	100.		µg/L	13.3	12/29/10 08:57	63210	1.00	XN
Ethylbenzene	16.	100.	J	µg/L	7.50	12/29/10 08:57	63210	1.00	XN
m,p-Xylene	59.	200.	J	µg/L	14.0	12/29/10 08:57	63210	1.00	XN
Methyl tert-butyl ether	< 100.	100.		µg/L	12.0	12/29/10 08:57	63210	1.00	XN
Methylene chloride	< 100.	100.		µg/L	14.5	12/29/10 08:57	63210	1.00	XN
o-Xylene	211.	100.		µg/L	10.0	12/29/10 08:57	63210	1.00	XN
Styrene	44.	100.	J	µg/L	13.0	12/29/10 08:57	63210	1.00	XN
Tetrachloroethene	< 100.	100.		µg/L	22.0	12/29/10 08:57	63210	1.00	XN
Toluene	28.	100.	J	µg/L	10.8	12/29/10 08:57	63210	1.00	XN
trans-1,2-Dichloroethene	< 100.	100.		µg/L	15.5	12/29/10 08:57	63210	1.00	XN
Trichloroethene	< 100.	100.		µg/L	14.6	12/29/10 08:57	63210	1.00	XN
Vinyl acetate	< 100.	100.		µg/L	10.5	12/29/10 08:57	63210	1.00	XN
Vinyl chloride	< 100.	100.		µg/L	22.0	12/29/10 08:57	63210	1.00	XN
1,3-Dichloropropene, Total	< 200.	200.		µg/L	19.0	12/29/10 08:57	63210	1.00	XN
Xylenes, Total	270.	300.	J	µg/L	30.0	12/29/10 08:57	63210	1.00	XN
Surrogates:									
1,2-Dichloroethane-d4	131	72-146		%REC	50.0	12/29/10 08:57	63210	1.00	XN
4-Bromofluorobenzene	107	60-126		%REC	50.0	12/29/10 08:57	63210	1.00	XN
d4-1,2-Dichlorobenzene	128	54-121	S	%REC	50.0	12/29/10 08:57	63210	1.00	XN
Dibromofluoromethane	116	60-126		%REC	50.0	12/29/10 08:57	63210	1.00	XN
Fluorobenzene	97.0	65-139		%REC	50.0	12/29/10 08:57	63210	1.00	XN
Toluene-d8	95.1	62-135		%REC	50.0	12/29/10 08:57	63210	1.00	XN

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

3100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.348.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT: Badger Disposal of Wisconsin
Client Sample ID: BDW-3
Lab Order: 10120609
Report Date: 1/6/2011
Project: Sample analysis
Collection Date: 12/28/2010
Lab ID: 10120609-04
Matrix: Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
ICP Metals, Groundwater Total		**Method:**		**SW6010C / SW3015**					
Arsenic	0.056	0.1	J	mg/L	0.0136	12/29/10 11:31	63206	1.00	AG
Barium	0.387	0.1		mg/L	0.00540	12/29/10 11:31	63206	1.00	AG
Cadmium	0.015	0.1	J	mg/L	0.00560	12/29/10 11:31	63206	1.00	AG
Chromium	0.293	0.1		mg/L	0.00680	12/29/10 11:31	63206	1.00	AG
Lead	0.166	0.1		mg/L	0.00920	12/29/10 11:31	63206	1.00	AG
Selenium	< 0.1	0.1		mg/L	0.0304	12/29/10 11:31	63206	1.00	AG
Silver	< 0.1	0.1		mg/L	0.0234	12/29/10 11:31	63206	1.00	AG
Mercury, Total		**Method:**		**SW7470A / HG PREP**					
Mercury	0.0058	0.0005		mg/L	0.000192	12/29/10	63214	1.00	IG
Semivolatile Organic Compounds GC/MS		**Method:**		**SW8270D / SW3510C**					
1,2,4-Trichlorobenzene	< 144.	144.		µg/L	51.9	1/4/11 15:18	63236	1.00	MG3
1,2-Dichlorobenzene	< 144.	144.		µg/L	40.3	1/4/11 15:18	63236	1.00	MG3
1,3-Dichlorobenzene	< 144.	144.		µg/L	38.9	1/4/11 15:18	63236	1.00	MG3
1,4-Dichlorobenzene	< 144.	144.		µg/L	53.3	1/4/11 15:18	63236	1.00	MG3
2,4,5-Trichlorophenol	< 1540.	1540.		µg/L	514	1/4/11 15:18	63236	1.00	MG3
2,4,6-Trichlorophenol	< 1560.	1560.		µg/L	521	1/4/11 15:18	63236	1.00	MG3
2,4-Dichlorophenol	< 1650.	1650.		µg/L	550	1/4/11 15:18	63236	1.00	MG3
2,4-Dimethylphenol	< 2080.	2080.		µg/L	693	1/4/11 15:18	63236	1.00	MG3
2,4-Dinitrophenol	< 11600.	11600.		µg/L	3,870	1/4/11 15:18	63236	1.00	MG3
2,4-Dinitrotoluene	< 3600.	3600.		µg/L	435	1/4/11 15:18	63236	1.00	MG3
2,6-Dinitrotoluene	< 2130.	2130.		µg/L	712	1/4/11 15:18	63236	1.00	MG3
2-Chloronaphthalene	< 144.	144.		µg/L	70.6	1/4/11 15:18	63236	1.00	MG3
2-Chlorophenol	< 1160.	1160.		µg/L	387	1/4/11 15:18	63236	1.00	MG3
3,3'-Dichlorobenzidine	< 1440.	1440.		µg/L	287	1/4/11 15:18	63236	1.00	MG3
3-Nitroaniline	< 1440.	1440.		µg/L	287	1/4/11 15:18	63236	1.00	MG3
4,6-Dinitro-2-methylphenol	< 7200.	7200.		µg/L	902	1/4/11 15:18	63236	1.00	MG3
4-Bromophenyl phenyl ether	< 144.	144.		µg/L	64.8	1/4/11 15:18	63236	1.00	MG3
4-Chloro-3-methylphenol	< 1320.	1320.		µg/L	441	1/4/11 15:18	63236	1.00	MG3
4-Chloroaniline	< 144.	144.		µg/L	59.1	1/4/11 15:18	63236	1.00	MG3
4-Chlorophenyl phenyl ether	< 144.	144.		µg/L	37.4	1/4/11 15:18	63236	1.00	MG3
4-Nitrophenol	< 3600.	3600.		µg/L	567	1/4/11 15:18	63236	1.00	MG3

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

9100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.348.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT: Badger Disposal of Wisconsin
Client Sample ID: BDW-3
Lab Order: 10120609
Report Date: 1/6/2011
Project: Sample analysis
Collection Date: 12/28/2010
Lab ID: 10120609-04
Matrix: Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
Acenaphthene	< 144.	144.		µg/L	44.7	1/4/11 15:18	63236	1.00	MG3
Acenaphthylene	< 144.	144.		µg/L	44.7	1/4/11 15:18	63236	1.00	MG3
Anthracene	< 144.	144.		µg/L	40.3	1/4/11 15:18	63236	1.00	MG3
Azobenzene as 1,2-Diphenylhydrazine	< 144.	144.		µg/L	50.4	1/4/11 15:18	63236	1.00	MG3
Benz(a)anthracene	< 144.	144.		µg/L	51.9	1/4/11 15:18	63236	1.00	MG3
Benzidine	< 4480.	4480.		µg/L	1,490	1/4/11 15:18	63236	1.00	MG3
Benzo(a)pyrene	< 3600.	3600.		µg/L	51.9	1/4/11 15:18	63236	1.00	MG3
Benzo(b)fluoranthene	< 144.	144.		µg/L	54.7	1/4/11 15:18	63236	1.00	MG3
Benzo(g,h,i)perylene	< 3600.	3600.		µg/L	57.6	1/4/11 15:18	63236	1.00	MG3
Benzo(k)fluoranthene	< 144.	144.		µg/L	63.4	1/4/11 15:18	63236	1.00	MG3
Bis(2-chloroethoxy)methane	< 907.	907.		µg/L	302	1/4/11 15:18	63236	1.00	MG3
Bis(2-chloroethyl)ether	< 144.	144.		µg/L	63.4	1/4/11 15:18	63236	1.00	MG3
Bis(2-chloroisopropyl)ether	< 144.	144.		µg/L	125	1/4/11 15:18	63236	1.00	MG3
Bis(2-ethylhexyl)phthalate	350.	7200.	J	µg/L	121	1/4/11 15:18	63236	1.00	MG3
Butyl benzyl phthalate	< 1440.	1440.		µg/L	475	1/4/11 15:18	63236	1.00	MG3
Carbazole	< 1160.	1160.		µg/L	386	1/4/11 15:18	63236	1.00	MG3
Chrysene	< 144.	144.		µg/L	64.8	1/4/11 15:18	63236	1.00	MG3
Di-n-butyl phthalate	< 3600.	3600.		µg/L	31.7	1/4/11 15:18	63236	1.00	MG3
Di-n-octyl phthalate	< 3600.	3600.		µg/L	74.9	1/4/11 15:18	63236	1.00	MG3
Dibenz(a,h)anthracene	< 3600.	3600.		µg/L	69.1	1/4/11 15:18	63236	1.00	MG3
Diethyl phthalate	< 144.	144.		µg/L	53.3	1/4/11 15:18	63236	1.00	MG3
Dimethyl phthalate	82.	144.	J	µg/L	70.6	1/4/11 15:18	63236	1.00	MG3
Fluoranthene	< 144.	144.		µg/L	50.4	1/4/11 15:18	63236	1.00	MG3
Fluorene	< 144.	144.		µg/L	61.9	1/4/11 15:18	63236	1.00	MG3
Hexachlorobenzene	< 144.	144.		µg/L	53.3	1/4/11 15:18	63236	1.00	MG3
Hexachlorobutadiene	< 144.	144.		µg/L	59.1	1/4/11 15:18	63236	1.00	MG3
Hexachlorocyclopentadiene	< 1720.	1720.		µg/L	573	1/4/11 15:18	63236	1.00	MG3
Hexachloroethane	< 144.	144.		µg/L	69.1	1/4/11 15:18	63236	1.00	MG3
Indeno(1,2,3-cd)pyrene	< 7200.	7200.		µg/L	49.0	1/4/11 15:18	63236	1.00	MG3
Isophorone	< 144.	144.		µg/L	61.9	1/4/11 15:18	63236	1.00	MG3
m,p-Cresol	< 1740.	1740.		µg/L	580	1/4/11 15:18	63236	1.00	MG3
N-Nitrosodi-n-propylamine	< 144.	144.		µg/L	125	1/4/11 15:18	63236	1.00	MG3

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin • Morton Grove, IL 60053-3203
847.967.5666 • 800.248.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT: Badger Disposal of Wisconsin
Lab Order: 10120609
Project: Sample analysis
Lab ID: 10120609-04

Client Sample ID: BDW-3
Report Date: 1/6/2011
Collection Date: 12/28/2010
Matrix: Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
N-Nitrosodimethylamine	< 144.	144.		µg/L	63.4	1/4/11 15:18	63236	1.00	MG3
N-Nitrosodiphenylamine	< 144.	144.		µg/L	43.2	1/4/11 15:18	63236	1.00	MG3
Naphthalene	< 144.	144.		µg/L	59.1	1/4/11 15:18	63236	1.00	MG3
Nitrobenzene	< 144.	144.		µg/L	117	1/4/11 15:18	63236	1.00	MG3
o-Cresol	< 1800.	1800.		µg/L	599	1/4/11 15:18	63236	1.00	MG3
Pentachlorophenol	< 3600.	3600.		µg/L	429	1/4/11 15:18	63236	1.00	MG3
Phenanthrene	< 144.	144.		µg/L	38.9	1/4/11 15:18	63236	1.00	MG3
Phenol	< 1210.	1210.		µg/L	405	1/4/11 15:18	63236	1.00	MG3
Pyrene	< 144.	144.		µg/L	61.9	1/4/11 15:18	63236	1.00	MG3
Surrogates:									
2,4,6-Tribromophenol	113	5-139		%REC	0	1/4/11 15:18	63236	1.00	MG3
2-Fluorobiphenyl	76.8	5-122		%REC	0	1/4/11 15:18	63236	1.00	MG3
2-Fluorophenol	57.9	5-92.5		%REC	0	1/4/11 15:18	63236	1.00	MG3
4-Terphenyl-d14	133	14.4-90.6	S	%REC	0	1/4/11 15:18	63236	1.00	MG3
Nitrobenzene-d5	68.0	5-110		%REC	0	1/4/11 15:18	63236	1.00	MG3
Phenol-d5	80.1	5-72.9	S	%REC	0	1/4/11 15:18	63236	1.00	MG3
Volatile Organic Compounds by GC/MS		**Method:**		**SW8260B / SW5030A**					
1,1,1-Trichloroethane	< 100.	100.		µg/L	17.5	12/29/10 09:30	63210	1.00	XN
1,1,2,2-Tetrachloroethane	< 100.	100.		µg/L	20.3	12/29/10 09:30	63210	1.00	XN
1,1,2-Trichloroethane	< 100.	100.		µg/L	11.0	12/29/10 09:30	63210	1.00	XN
1,1-Dichloroethane	< 100.	100.		µg/L	16.0	12/29/10 09:30	63210	1.00	XN
1,1-Dichloroethene	< 100.	100.		µg/L	37.5	12/29/10 09:30	63210	1.00	XN
1,2-Dibromo-3-chloropropane	< 100.	100.		µg/L	50.0	12/29/10 09:30	63210	1.00	XN
1,2-Dibromoethane	< 100.	100.		µg/L	13.0	12/29/10 09:30	63210	1.00	XN
1,2-Dichloroethane	84.	100.	J	µg/L	10.0	12/29/10 09:30	63210	1.00	XN
1,2-Dichloropropane	< 100.	100.		µg/L	11.0	12/29/10 09:30	63210	1.00	XN
1-Butanol	< 5000.	5000.		µg/L	1,270	12/29/10 09:30	63210	1.00	XN
2-Butanone	440.	1000.	J	µg/L	115	12/29/10 09:30	63210	1.00	XN
2-Hexanone	< 1000.	1000.		µg/L	50.5	12/29/10 09:30	63210	1.00	XN
4-Methyl-2-pentanone	< 1000.	1000.		µg/L	128	12/29/10 09:30	63210	1.00	XN
Acetone	< 2000.	2000.		µg/L	214	12/29/10 09:30	63210	1.00	XN
Acrylonitrile	< 1000.	1000.		µg/L	184	12/29/10 09:30	63210	1.00	XN
Benzene	< 100.	100.		µg/L	10.0	12/29/10 09:30	63210	1.00	XN

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin • Morton Grove, IL 60053-3293
847.967.5666 • 800.245.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT: Badger Disposal of Wisconsin
Client Sample ID: BDW-3
Lab Order: 10120609
Report Date: 1/6/2011
Project: Sample analysis
Collection Date: 12/28/2010
Lab ID: 10120609-04
Matrix: Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
Bromodichloromethane	< 100.	100.		µg/L	10.0	12/29/10 09:30	63210	1.00	XN
Bromoform	149.	100.		µg/L	33.5	12/29/10 09:30	63210	1.00	XN
Bromomethane	< 100.	100.		µg/L	11.5	12/29/10 09:30	63210	1.00	XN
Carbon disulfide	< 100.	100.		µg/L	20.5	12/29/10 09:30	63210	1.00	XN
Carbon tetrachloride	< 100.	100.		µg/L	16.5	12/29/10 09:30	63210	1.00	XN
Chlorobenzene	< 100.	100.		µg/L	9.50	12/29/10 09:30	63210	1.00	XN
Chloroethane	< 100.	100.		µg/L	25.0	12/29/10 09:30	63210	1.00	XN
Chloroform	1500.	100.		µg/L	11.7	12/29/10 09:30	63210	1.00	XN
Chloromethane	< 100.	100.		µg/L	14.6	12/29/10 09:30	63210	1.00	XN
cis-1,2-Dichloroethene	< 100.	100.		µg/L	19.0	12/29/10 09:30	63210	1.00	XN
Dibromochloromethane	< 100.	100.		µg/L	13.3	12/29/10 09:30	63210	1.00	XN
Ethylbenzene	15.	100.	J	µg/L	7.50	12/29/10 09:30	63210	1.00	XN
m,p-Xylene	58.	200.	J	µg/L	14.0	12/29/10 09:30	63210	1.00	XN
Methyl tert-butyl ether	< 100.	100.		µg/L	12.0	12/29/10 09:30	63210	1.00	XN
Methylene chloride	< 100.	100.		µg/L	14.5	12/29/10 09:30	63210	1.00	XN
o-Xylene	213.	100.		µg/L	10.0	12/29/10 09:30	63210	1.00	XN
Styrene	< 100.	100.		µg/L	13.0	12/29/10 09:30	63210	1.00	XN
Tetrachloroethene	< 100.	100.		µg/L	22.0	12/29/10 09:30	63210	1.00	XN
Toluene	36.	100.	J	µg/L	10.8	12/29/10 09:30	63210	1.00	XN
trans-1,2-Dichloroethene	< 100.	100.		µg/L	15.5	12/29/10 09:30	63210	1.00	XN
Trichloroethene	< 100.	100.		µg/L	14.6	12/29/10 09:30	63210	1.00	XN
Vinyl acetate	< 100.	100.		µg/L	10.5	12/29/10 09:30	63210	1.00	XN
Vinyl chloride	< 100.	100.		µg/L	22.0	12/29/10 09:30	63210	1.00	XN
1,3-Dichloropropene, Total	< 200.	200.		µg/L	19.0	12/29/10 09:30	63210	1.00	XN
Xylenes, Total	270.	300.	J	µg/L	30.0	12/29/10 09:30	63210	1.00	XN
Surrogates:									
1,2-Dichloroethane-d4	126	72-146		%REC	50.0	12/29/10 09:30	63210	1.00	XN
4-Bromofluorobenzene	102	60-126		%REC	50.0	12/29/10 09:30	63210	1.00	XN
d4-1,2-Dichlorobenzene	126	54-121	S	%REC	50.0	12/29/10 09:30	63210	1.00	XN
Dibromofluoromethane	119	60-126		%REC	50.0	12/29/10 09:30	63210	1.00	XN
Fluorobenzene	94.4	65-139		%REC	50.0	12/29/10 09:30	63210	1.00	XN
Toluene-d8	93.7	62-135		%REC	50.0	12/29/10 09:30	63210	1.00	XN

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL
MONITORING AND
TECHNOLOGIES, INC.

8100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.245.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT:	Badger Disposal of Wisconsin	**Client Sample ID:**	BDW-4
Lab Order:	10120609	**Report Date:**	1/6/2011
Project:	Sample analysis	**Collection Date:**	12/28/2010
Lab ID:	10120609-05	**Matrix:**	Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
ICP Metals, Groundwater Total		**Method:**		**SW6010C / SW3015**					
Arsenic	0.066	0.1	J	mg/L	0.0136	12/29/10 11:31	63206	1.00	AG
Barium	0.495	0.1		mg/L	0.00540	12/29/10 11:31	63206	1.00	AG
Cadmium	0.016	0.1	J	mg/L	0.00560	12/29/10 11:31	63206	1.00	AG
Chromium	0.316	0.1		mg/L	0.00680	12/29/10 11:31	63206	1.00	AG
Lead	0.186	0.1		mg/L	0.00920	12/29/10 11:31	63206	1.00	AG
Selenium	< 0.1	0.1		mg/L	0.0304	12/29/10 11:31	63206	1.00	AG
Silver	< 0.1	0.1		mg/L	0.0234	12/29/10 11:31	63206	1.00	AG
Mercury, Total		**Method:**		**SW7470A / HG PREP**					
Mercury	0.0068	0.0005		mg/L	0.000192	12/29/10	63214	1.00	IG
Semivolatile Organic Compounds GC/MS		**Method:**		**SW8270D / SW3510C**					
1,2,4-Trichlorobenzene	< 142.	142.		µg/L	51.0	1/4/11 16:01	63236	1.00	MG3
1,2-Dichlorobenzene	< 142.	142.		µg/L	39.7	1/4/11 16:01	63236	1.00	MG3
1,3-Dichlorobenzene	< 142.	142.		µg/L	38.3	1/4/11 16:01	63236	1.00	MG3
1,4-Dichlorobenzene	< 142.	142.		µg/L	52.4	1/4/11 16:01	63236	1.00	MG3
2,4,5-Trichlorophenol	< 1520.	1520.		µg/L	506	1/4/11 16:01	63236	1.00	MG3
2,4,6-Trichlorophenol	< 1540.	1540.		µg/L	513	1/4/11 16:01	63236	1.00	MG3
2,4-Dichlorophenol	< 1620.	1620.		µg/L	541	1/4/11 16:01	63236	1.00	MG3
2,4-Dimethylphenol	< 2040.	2040.		µg/L	682	1/4/11 16:01	63236	1.00	MG3
2,4-Dinitrophenol	< 11400.	11400.		µg/L	3,810	1/4/11 16:01	63236	1.00	MG3
2,4-Dinitrotoluene	< 3540.	3540.		µg/L	428	1/4/11 16:01	63236	1.00	MG3
2,6-Dinitrotoluene	< 2100.	2100.		µg/L	700	1/4/11 16:01	63236	1.00	MG3
2-Chloronaphthalene	< 142.	142.		µg/L	69.4	1/4/11 16:01	63236	1.00	MG3
2-Chlorophenol	< 1140.	1140.		µg/L	381	1/4/11 16:01	63236	1.00	MG3
3,3'-Dichlorobenzidine	< 1420.	1420.		µg/L	282	1/4/11 16:01	63236	1.00	MG3
3-Nitroaniline	< 1420.	1420.		µg/L	282	1/4/11 16:01	63236	1.00	MG3
4,6-Dinitro-2-methylphenol	< 7090.	7090.		µg/L	887	1/4/11 16:01	63236	1.00	MG3
4-Bromophenyl phenyl ether	< 142.	142.		µg/L	63.8	1/4/11 16:01	63236	1.00	MG3
4-Chloro-3-methylphenol	< 1300.	1300.		µg/L	434	1/4/11 16:01	63236	1.00	MG3
4-Chloroaniline	< 142.	142.		µg/L	58.1	1/4/11 16:01	63236	1.00	MG3
4-Chlorophenyl phenyl ether	< 142.	142.		µg/L	36.8	1/4/11 16:01	63236	1.00	MG3
4-Nitrophenol	< 3540.	3540.		µg/L	558	1/4/11 16:01	63236	1.00	MG3

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.246.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT:	Badger Disposal of Wisconsin	**Client Sample ID:**	BDW-4
Lab Order:	10120609	**Report Date:**	1/6/2011
Project:	Sample analysis	**Collection Date:**	12/28/2010
Lab ID:	10120609-05	**Matrix:**	Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
Acenaphthene	< 142.	142.		µg/L	43.9	1/4/11 16:01	63236	1.00	MG3
Acenaphthylene	< 142.	142.		µg/L	43.9	1/4/11 16:01	63236	1.00	MG3
Anthracene	< 142.	142.		µg/L	39.7	1/4/11 16:01	63236	1.00	MG3
Azobenzene as 1,2-Diphenylhydrazine	< 142.	142.		µg/L	49.6	1/4/11 16:01	63236	1.00	MG3
Benz(a)anthracene	< 142.	142.		µg/L	51.0	1/4/11 16:01	63236	1.00	MG3
Benzidine	< 4400.	4400.		µg/L	1,470	1/4/11 16:01	63236	1.00	MG3
Benzo(a)pyrene	< 3540.	3540.		µg/L	51.0	1/4/11 16:01	63236	1.00	MG3
Benzo(b)fluoranthene	< 142.	142.		µg/L	53.8	1/4/11 16:01	63236	1.00	MG3
Benzo(g,h,i)perylene	< 3540.	3540.		µg/L	56.7	1/4/11 16:01	63236	1.00	MG3
Benzo(k)fluoranthene	< 142.	142.		µg/L	62.3	1/4/11 16:01	63236	1.00	MG3
Bis(2-chloroethoxy)methane	< 893.	893.		µg/L	298	1/4/11 16:01	63236	1.00	MG3
Bis(2-chloroethyl)ether	< 142.	142.		µg/L	62.3	1/4/11 16:01	63236	1.00	MG3
Bis(2-chloroisopropyl)ether	< 142.	142.		µg/L	123	1/4/11 16:01	63236	1.00	MG3
Bis(2-ethylhexyl)phthalate	280.	7090.	J	µg/L	119	1/4/11 16:01	63236	1.00	MG3
Butyl benzyl phthalate	< 1420.	1420.		µg/L	468	1/4/11 16:01	63236	1.00	MG3
Carbazole	< 1140.	1140.		µg/L	380	1/4/11 16:01	63236	1.00	MG3
Chrysene	< 142.	142.		µg/L	63.8	1/4/11 16:01	63236	1.00	MG3
Di-n-butyl phthalate	< 3540.	3540.		µg/L	31.2	1/4/11 16:01	63236	1.00	MG3
Di-n-octyl phthalate	< 3540.	3540.		µg/L	73.7	1/4/11 16:01	63236	1.00	MG3
Dibenz(a,h)anthracene	< 3540.	3540.		µg/L	68.0	1/4/11 16:01	63236	1.00	MG3
Diethyl phthalate	< 142.	142.		µg/L	52.4	1/4/11 16:01	63236	1.00	MG3
Dimethyl phthalate	71.	142.	J	µg/L	69.4	1/4/11 16:01	63236	1.00	MG3
Fluoranthene	< 142.	142.		µg/L	49.6	1/4/11 16:01	63236	1.00	MG3
Fluorene	< 142.	142.		µg/L	60.9	1/4/11 16:01	63236	1.00	MG3
Hexachlorobenzene	< 142.	142.		µg/L	52.4	1/4/11 16:01	63236	1.00	MG3
Hexachlorobutadiene	< 142.	142.		µg/L	58.1	1/4/11 16:01	63236	1.00	MG3
Hexachlorocyclopentadiene	< 1690.	1690.		µg/L	564	1/4/11 16:01	63236	1.00	MG3
Hexachloroethane	< 142.	142.		µg/L	68.0	1/4/11 16:01	63236	1.00	MG3
Indeno(1,2,3-cd)pyrene	< 7090.	7090.		µg/L	48.2	1/4/11 16:01	63236	1.00	MG3
Isophorone	< 142.	142.		µg/L	60.9	1/4/11 16:01	63236	1.00	MG3
m,p-Cresol	< 1710.	1710.		µg/L	571	1/4/11 16:01	63236	1.00	MG3
N-Nitrosodi-n-propylamine	< 142.	142.		µg/L	123	1/4/11 16:01	63236	1.00	MG3

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL
MONITORING AND
TECHNOLOGIES, INC.

8100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.248.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT: Badger Disposal of Wisconsin
Lab Order: 10120609
Project: Sample analysis
Lab ID: 10120609-05

Client Sample ID: BDW-4
Report Date: 1/6/2011
Collection Date: 12/28/2010
Matrix: Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
N-Nitrosodimethylamine	< 142.	142.		µg/L	62.3	1/4/11 16:01	63236	1.00	MG3
N-Nitrosodiphenylamine	< 142.	142.		µg/L	42.5	1/4/11 16:01	63236	1.00	MG3
Naphthalene	< 142.	142.		µg/L	58.1	1/4/11 16:01	63236	1.00	MG3
Nitrobenzene	< 142.	142.		µg/L	115	1/4/11 16:01	63236	1.00	MG3
o-Cresol	< 1770.	1770.		µg/L	589	1/4/11 16:01	63236	1.00	MG3
Pentachlorophenol	< 3540.	3540.		µg/L	422	1/4/11 16:01	63236	1.00	MG3
Phenanthrene	< 142.	142.		µg/L	38.3	1/4/11 16:01	63236	1.00	MG3
Phenol	< 1190.	1190.		µg/L	398	1/4/11 16:01	63236	1.00	MG3
Pyrene	< 142.	142.		µg/L	60.9	1/4/11 16:01	63236	1.00	MG3
Surrogates:									
2,4,6-Tribromophenol	87.8	5-139		%REC	0	1/4/11 16:01	63236	1.00	MG3
2-Fluorobiphenyl	66.9	5-122		%REC	0	1/4/11 16:01	63236	1.00	MG3
2-Fluorophenol	41.5	5-92.5		%REC	0	1/4/11 16:01	63236	1.00	MG3
4-Terphenyl-d14	107	14.4-90.6	S	%REC	0	1/4/11 16:01	63236	1.00	MG3
Nitrobenzene-d5	56.9	5-110		%REC	0	1/4/11 16:01	63236	1.00	MG3
Phenol-d5	70.5	5-72.9		%REC	0	1/4/11 16:01	63236	1.00	MG3
Volatile Organic Compounds by GC/MS		**Method:**		**SW8260B / SW5030A**					
1,1,1-Trichloroethane	< 20.	20.		µg/L	3.50	12/29/10 17:15	63222	1.00	XN
1,1,2,2-Tetrachloroethane	< 20.	20.		µg/L	4.06	12/29/10 17:15	63222	1.00	XN
1,1,2-Trichloroethane	< 20.	20.		µg/L	2.20	12/29/10 17:15	63222	1.00	XN
1,1-Dichloroethane	< 20.	20.		µg/L	3.20	12/29/10 17:15	63222	1.00	XN
1,1-Dichloroethene	< 20.	20.		µg/L	7.50	12/29/10 17:15	63222	1.00	XN
1,2-Dibromo-3-chloropropane	< 20.	20.		µg/L	10.0	12/29/10 17:15	63222	1.00	XN
1,2-Dibromoethane	< 20.	20.		µg/L	2.60	12/29/10 17:15	63222	1.00	XN
1,2-Dichloroethane	86.8	20.		µg/L	2.00	12/29/10 17:15	63222	1.00	XN
1,2-Dichloropropane	< 20.	20.		µg/L	2.20	12/29/10 17:15	63222	1.00	XN
1-Butanol	870.	1000.	J	µg/L	254	12/29/10 17:15	63222	1.00	XN
2-Butanone	574.	200.		µg/L	23.0	12/29/10 17:15	63222	1.00	XN
2-Hexanone	< 200.	200.		µg/L	10.1	12/29/10 17:15	63222	1.00	XN
4-Methyl-2-pentanone	170.	200.	J	µg/L	25.7	12/29/10 17:15	63222	1.00	XN
Acetone	1210.	400.		µg/L	42.8	12/29/10 17:15	63222	1.00	XN
Acrylonitrile	< 200.	200.		µg/L	36.7	12/29/10 17:15	63222	1.00	XN
Benzene	4.5	20.	J	µg/L	2.00	12/29/10 17:15	63222	1.00	XN

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin • Morton Grove, IL 60053-3203
847.967.5566 • 800.246.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT:	Badger Disposal of Wisconsin	**Client Sample ID:**	BDW-4
Lab Order:	10120609	**Report Date:**	1/6/2011
Project:	Sample analysis	**Collection Date:**	12/28/2010
Lab ID:	10120609-05	**Matrix:**	Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
Bromodichloromethane	< 20.	20.		µg/L	2.00	12/29/10 17:15	63222	1.00	XN
Bromoform	193.	20.		µg/L	6.70	12/29/10 17:15	63222	1.00	XN
Bromomethane	< 20.	20.		µg/L	2.30	12/29/10 17:15	63222	1.00	XN
Carbon disulfide	< 20.	20.		µg/L	4.10	12/29/10 17:15	63222	1.00	XN
Carbon tetrachloride	< 20.	20.		µg/L	3.30	12/29/10 17:15	63222	1.00	XN
Chlorobenzene	< 20.	20.		µg/L	1.90	12/29/10 17:15	63222	1.00	XN
Chloroethane	< 20.	20.		µg/L	5.00	12/29/10 17:15	63222	1.00	XN
Chloroform	1280.	20.		µg/L	2.35	12/29/10 17:15	63222	1.00	XN
Chloromethane	< 20.	20.		µg/L	2.93	12/29/10 17:15	63222	1.00	XN
cis-1,2-Dichloroethene	< 20.	20.		µg/L	3.80	12/29/10 17:15	63222	1.00	XN
Dibromochloromethane	< 20.	20.		µg/L	2.65	12/29/10 17:15	63222	1.00	XN
Ethylbenzene	18.	20.	J	µg/L	1.50	12/29/10 17:15	63222	1.00	XN
m,p-Xylene	93.4	40.		µg/L	2.80	12/29/10 17:15	63222	1.00	XN
Methyl tert-butyl ether	< 20.	20.		µg/L	2.40	12/29/10 17:15	63222	1.00	XN
Methylene chloride	85.9	20.		µg/L	2.91	12/29/10 17:15	63222	1.00	XN
o-Xylene	57.5	20.		µg/L	2.00	12/29/10 17:15	63222	1.00	XN
Styrene	9.7	20.	J	µg/L	2.60	12/29/10 17:15	63222	1.00	XN
Tetrachloroethene	< 20.	20.		µg/L	4.40	12/29/10 17:15	63222	1.00	XN
Toluene	25.5	20.		µg/L	2.17	12/29/10 17:15	63222	1.00	XN
trans-1,2-Dichloroethene	< 20.	20.		µg/L	3.10	12/29/10 17:15	63222	1.00	XN
Trichloroethene	3.	20.	J	µg/L	2.93	12/29/10 17:15	63222	1.00	XN
Vinyl acetate	< 20.	20.		µg/L	2.10	12/29/10 17:15	63222	1.00	XN
Vinyl chloride	< 20.	20.		µg/L	4.40	12/29/10 17:15	63222	1.00	XN
1,3-Dichloropropene, Total	< 40.	40.		µg/L	3.80	12/29/10 17:15	63222	1.00	XN
Xylenes, Total	151.	60.		µg/L	6.00	12/29/10 17:15	63222	1.00	XN
Surrogates:									
1,2-Dichloroethane-d4	130	72-146		%REC	10.0	12/29/10 17:15	63222	1.00	XN
4-Bromofluorobenzene	131	60-126	S	%REC	10.0	12/29/10 17:15	63222	1.00	XN
d4-1,2-Dichlorobenzene	120	54-121		%REC	10.0	12/29/10 17:15	63222	1.00	XN
Dibromofluoromethane	105	60-126		%REC	10.0	12/29/10 17:15	63222	1.00	XN
Fluorobenzene	97.8	65-139		%REC	10.0	12/29/10 17:15	63222	1.00	XN
Toluene-d8	99.3	62-135		%REC	10.0	12/29/10 17:15	63222	1.00	XN

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin • Morton Grove, IL 60053-3203
847.967.0666 • 800.346.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT:	Badger Disposal of Wisconsin	**Client Sample ID:**	BDW-5
Lab Order:	10120609	**Report Date:**	1/6/2011
Project:	Sample analysis	**Collection Date:**	12/28/2010
Lab ID:	10120609-06	**Matrix:**	Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
ICP Metals, Groundwater Total		**Method:**		**SW6010C / SW3015**					
Arsenic	0.026	0.1	J	mg/L	0.0136	12/29/10 11:31	63206	1.00	AG
Barium	0.346	0.1		mg/L	0.00540	12/29/10 11:31	63206	1.00	AG
Cadmium	< 0.1	0.1		mg/L	0.00560	12/29/10 11:31	63206	1.00	AG
Chromium	0.184	0.1		mg/L	0.00680	12/29/10 11:31	63206	1.00	AG
Lead	0.103	0.1		mg/L	0.00920	12/29/10 11:31	63206	1.00	AG
Selenium	< 0.1	0.1		mg/L	0.0304	12/29/10 11:31	63206	1.00	AG
Silver	< 0.1	0.1		mg/L	0.0234	12/29/10 11:31	63206	1.00	AG
Mercury, Total		**Method:**		**SW7470A / HG PREP**					
Mercury	0.0627	0.005		mg/L	0.00192	12/29/10	63214	10.0	IG
Semivolatile Organic Compounds GC/MS		**Method:**		**SW8270D / SW3510C**					
1,2,4-Trichlorobenzene	< 141.	141.		µg/L	50.8	1/4/11 16:45	63236	1.00	MG3
1,2-Dichlorobenzene	< 141.	141.		µg/L	39.5	1/4/11 16:45	63236	1.00	MG3
1,3-Dichlorobenzene	< 141.	141.		µg/L	38.1	1/4/11 16:45	63236	1.00	MG3
1,4-Dichlorobenzene	< 141.	141.		µg/L	52.2	1/4/11 16:45	63236	1.00	MG3
2,4,5-Trichlorophenol	< 1510.	1510.		µg/L	504	1/4/11 16:45	63236	1.00	MG3
2,4,6-Trichlorophenol	< 1530.	1530.		µg/L	511	1/4/11 16:45	63236	1.00	MG3
2,4-Dichlorophenol	< 1620.	1620.		µg/L	539	1/4/11 16:45	63236	1.00	MG3
2,4-Dimethylphenol	< 2040.	2040.		µg/L	679	1/4/11 16:45	63236	1.00	MG3
2,4-Dinitrophenol	< 11400.	11400.		µg/L	3,790	1/4/11 16:45	63236	1.00	MG3
2,4-Dinitrotoluene	< 3530.	3530.		µg/L	426	1/4/11 16:45	63236	1.00	MG3
2,6-Dinitrotoluene	< 2090.	2090.		µg/L	697	1/4/11 16:45	63236	1.00	MG3
2-Chloronaphthalene	< 141.	141.		µg/L	69.2	1/4/11 16:45	63236	1.00	MG3
2-Chlorophenol	< 1140.	1140.		µg/L	380	1/4/11 16:45	63236	1.00	MG3
3,3´-Dichlorobenzidine	< 1410.	1410.		µg/L	281	1/4/11 16:45	63236	1.00	MG3
3-Nitroaniline	< 1410.	1410.		µg/L	281	1/4/11 16:45	63236	1.00	MG3
4,6-Dinitro-2-methylphenol	< 7060.	7060.		µg/L	883	1/4/11 16:45	63236	1.00	MG3
4-Bromophenyl phenyl ether	< 141.	141.		µg/L	63.5	1/4/11 16:45	63236	1.00	MG3
4-Chloro-3-methylphenol	< 1300.	1300.		µg/L	432	1/4/11 16:45	63236	1.00	MG3
4-Chloroaniline	< 141.	141.		µg/L	57.9	1/4/11 16:45	63236	1.00	MG3
4-Chlorophenyl phenyl ether	< 141.	141.		µg/L	36.7	1/4/11 16:45	63236	1.00	MG3
4-Nitrophenol	< 3530.	3530.		µg/L	556	1/4/11 16:45	63236	1.00	MG3

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL
MONITORING AND
TECHNOLOGIES, INC.

9100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.346.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT: Badger Disposal of Wisconsin
Lab Order: 10120609
Project: Sample analysis
Lab ID: 10120609-06

Client Sample ID: BDW-5
Report Date: 1/6/2011
Collection Date: 12/28/2010
Matrix: Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
Acenaphthene	< 141.	141.		µg/L	43.7	1/4/11 16:45	63236	1.00	MG3
Acenaphthylene	< 141.	141.		µg/L	43.7	1/4/11 16:45	63236	1.00	MG3
Anthracene	< 141.	141.		µg/L	39.5	1/4/11 16:45	63236	1.00	MG3
Azobenzene as 1,2-Diphenylhydrazine	< 141.	141.		µg/L	49.4	1/4/11 16:45	63236	1.00	MG3
Benz(a)anthracene	< 141.	141.		µg/L	50.8	1/4/11 16:45	63236	1.00	MG3
Benzidine	< 4390.	4390.		µg/L	1,460	1/4/11 16:45	63236	1.00	MG3
Benzo(a)pyrene	< 3530.	3530.		µg/L	50.8	1/4/11 16:45	63236	1.00	MG3
Benzo(b)fluoranthene	< 141.	141.		µg/L	53.6	1/4/11 16:45	63236	1.00	MG3
Benzo(g,h,i)perylene	< 3530.	3530.		µg/L	56.5	1/4/11 16:45	63236	1.00	MG3
Benzo(k)fluoranthene	< 141.	141.		µg/L	62.1	1/4/11 16:45	63236	1.00	MG3
Bis(2-chloroethoxy)methane	< 889.	889.		µg/L	296	1/4/11 16:45	63236	1.00	MG3
Bis(2-chloroethyl)ether	< 141.	141.		µg/L	62.1	1/4/11 16:45	63236	1.00	MG3
Bis(2-chloroisopropyl)ether	< 141.	141.		µg/L	123	1/4/11 16:45	63236	1.00	MG3
Bis(2-ethylhexyl)phthalate	200.	7060.	J	µg/L	119	1/4/11 16:45	63236	1.00	MG3
Butyl benzyl phthalate	< 1410.	1410.		µg/L	466	1/4/11 16:45	63236	1.00	MG3
Carbazole	< 1130.	1130.		µg/L	378	1/4/11 16:45	63236	1.00	MG3
Chrysene	< 141.	141.		µg/L	63.5	1/4/11 16:45	63236	1.00	MG3
Di-n-butyl phthalate	< 3530.	3530.		µg/L	31.0	1/4/11 16:45	63236	1.00	MG3
Di-n-octyl phthalate	< 3530.	3530.		µg/L	73.4	1/4/11 16:45	63236	1.00	MG3
Dibenz(a,h)anthracene	< 3530.	3530.		µg/L	67.7	1/4/11 16:45	63236	1.00	MG3
Diethyl phthalate	< 141.	141.		µg/L	52.2	1/4/11 16:45	63236	1.00	MG3
Dimethyl phthalate	< 141.	141.		µg/L	69.2	1/4/11 16:45	63236	1.00	MG3
Fluoranthene	< 141.	141.		µg/L	49.4	1/4/11 16:45	63236	1.00	MG3
Fluorene	< 141.	141.		µg/L	60.7	1/4/11 16:45	63236	1.00	MG3
Hexachlorobenzene	< 141.	141.		µg/L	52.2	1/4/11 16:45	63236	1.00	MG3
Hexachlorobutadiene	< 141.	141.		µg/L	57.9	1/4/11 16:45	63236	1.00	MG3
Hexachlorocyclopentadiene	< 1690.	1690.		µg/L	562	1/4/11 16:45	63236	1.00	MG3
Hexachloroethane	< 141.	141.		µg/L	67.7	1/4/11 16:45	63236	1.00	MG3
Indeno(1,2,3-cd)pyrene	< 7060.	7060.		µg/L	48.0	1/4/11 16:45	63236	1.00	MG3
Isophorone	< 141.	141.		µg/L	60.7	1/4/11 16:45	63236	1.00	MG3
m,p-Cresol	< 1710.	1710.		µg/L	569	1/4/11 16:45	63236	1.00	MG3
N-Nitrosodi-n-propylamine	< 141.	141.		µg/L	123	1/4/11 16:45	63236	1.00	MG3

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

6100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.246.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT:	Badger Disposal of Wisconsin	**Client Sample ID:**	BDW-5
Lab Order:	10120609	**Report Date:**	1/6/2011
Project:	Sample analysis	**Collection Date:**	12/28/2010
Lab ID:	10120609-06	**Matrix:**	Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
N-Nitrosodimethylamine	< 141.	141.		µg/L	62.1	1/4/11 16:45	63236	1.00	MG3
N-Nitrosodiphenylamine	< 141.	141.		µg/L	42.3	1/4/11 16:45	63236	1.00	MG3
Naphthalene	< 141.	141.		µg/L	57.9	1/4/11 16:45	63236	1.00	MG3
Nitrobenzene	< 141.	141.		µg/L	114	1/4/11 16:45	63236	1.00	MG3
o-Cresol	< 1760.	1760.		µg/L	587	1/4/11 16:45	63236	1.00	MG3
Pentachlorophenol	< 3530.	3530.		µg/L	421	1/4/11 16:45	63236	1.00	MG3
Phenanthrene	< 141.	141.		µg/L	38.1	1/4/11 16:45	63236	1.00	MG3
Phenol	< 1190.	1190.		µg/L	397	1/4/11 16:45	63236	1.00	MG3
Pyrene	< 141.	141.		µg/L	60.7	1/4/11 16:45	63236	1.00	MG3
Surrogates:									
2,4,6-Tribromophenol	81.7	5-139		%REC	0	1/4/11 16:45	63236	1.00	MG3
2-Fluorobiphenyl	56.7	5-122		%REC	0	1/4/11 16:45	63236	1.00	MG3
2-Fluorophenol	48.6	5-92.5		%REC	0	1/4/11 16:45	63236	1.00	MG3
4-Terphenyl-d14	106	14.4-90.6	S	%REC	0	1/4/11 16:45	63236	1.00	MG3
Nitrobenzene-d5	54.5	5-110		%REC	0	1/4/11 16:45	63236	1.00	MG3
Phenol-d5	66.6	5-72.9		%REC	0	1/4/11 16:45	63236	1.00	MG3
Volatile Organic Compounds by GC/MS		**Method:**		**SW8260B / SW5030A**					
1,1,1-Trichloroethane	< 100.	100.		µg/L	17.5	12/29/10 10:03	63210	1.00	XN
1,1,2,2-Tetrachloroethane	< 100.	100.		µg/L	20.3	12/29/10 10:03	63210	1.00	XN
1,1,2-Trichloroethane	< 100.	100.		µg/L	11.0	12/29/10 10:03	63210	1.00	XN
1,1-Dichloroethane	< 100.	100.		µg/L	16.0	12/29/10 10:03	63210	1.00	XN
1,1-Dichloroethene	< 100.	100.		µg/L	37.5	12/29/10 10:03	63210	1.00	XN
1,2-Dibromo-3-chloropropane	< 100.	100.		µg/L	50.0	12/29/10 10:03	63210	1.00	XN
1,2-Dibromoethane	< 100.	100.		µg/L	13.0	12/29/10 10:03	63210	1.00	XN
1,2-Dichloroethane	416.	100.		µg/L	10.0	12/29/10 10:03	63210	1.00	XN
1,2-Dichloropropane	< 100.	100.		µg/L	11.0	12/29/10 10:03	63210	1.00	XN
1-Butanol	< 5000.	5000.		µg/L	1,270	12/29/10 10:03	63210	1.00	XN
2-Butanone	< 1000.	1000.		µg/L	115	12/29/10 10:03	63210	1.00	XN
2-Hexanone	< 1000.	1000.		µg/L	50.5	12/29/10 10:03	63210	1.00	XN
4-Methyl-2-pentanone	< 1000.	1000.		µg/L	128	12/29/10 10:03	63210	1.00	XN
Acetone	4700.	2000.		µg/L	214	12/29/10 10:03	63210	1.00	XN
Acrylonitrile	< 1000.	1000.		µg/L	184	12/29/10 10:03	63210	1.00	XN
Benzene	24.	100.	J	µg/L	10.0	12/29/10 10:03	63210	1.00	XN

Qualifiers:

B - Analyte detected in the associated Method Blank

E - Estimated

H - Holding Time Exceeded

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

3100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.246.0663 • fax: 847.967.6735 • www.emt.com

Report of Laboratory Analysis

CLIENT: Badger Disposal of Wisconsin
Client Sample ID: BDW-5
Lab Order: 10120609
Report Date: 1/6/2011
Project: Sample analysis
Collection Date: 12/28/2010
Lab ID: 10120609-06
Matrix: Liquid

Analyses	Result	EMT Reporting Limit	Qual	Units	MDL	Date Analyzed	Batch	DF	Analyst
Bromodichloromethane	< 100.	100.		µg/L	10.0	12/29/10 10:03	63210	1.00	XN
Bromoform	150.	100.		µg/L	33.5	12/29/10 10:03	63210	1.00	XN
Bromomethane	< 100.	100.		µg/L	11.5	12/29/10 10:03	63210	1.00	XN
Carbon disulfide	< 100.	100.		µg/L	20.5	12/29/10 10:03	63210	1.00	XN
Carbon tetrachloride	< 100.	100.		µg/L	16.5	12/29/10 10:03	63210	1.00	XN
Chlorobenzene	< 100.	100.		µg/L	9.50	12/29/10 10:03	63210	1.00	XN
Chloroethane	< 100.	100.		µg/L	25.0	12/29/10 10:03	63210	1.00	XN
Chloroform	3510.	100.		µg/L	11.7	12/29/10 10:03	63210	1.00	XN
Chloromethane	< 100.	100.		µg/L	14.6	12/29/10 10:03	63210	1.00	XN
cis-1,2-Dichloroethene	< 100.	100.		µg/L	19.0	12/29/10 10:03	63210	1.00	XN
Dibromochloromethane	< 100.	100.		µg/L	13.3	12/29/10 10:03	63210	1.00	XN
Ethylbenzene	81.	100.	J	µg/L	7.50	12/29/10 10:03	63210	1.00	XN
m,p-Xylene	410.	200.		µg/L	14.0	12/29/10 10:03	63210	1.00	XN
Methyl tert-butyl ether	< 100.	100.		µg/L	12.0	12/29/10 10:03	63210	1.00	XN
Methylene chloride	< 100.	100.		µg/L	14.5	12/29/10 10:03	63210	1.00	XN
o-Xylene	255.	100.		µg/L	10.0	12/29/10 10:03	63210	1.00	XN
Styrene	50.	100.	J	µg/L	13.0	12/29/10 10:03	63210	1.00	XN
Tetrachloroethene	< 100.	100.		µg/L	22.0	12/29/10 10:03	63210	1.00	XN
Toluene	718.	100.		µg/L	10.8	12/29/10 10:03	63210	1.00	XN
trans-1,2-Dichloroethene	< 100.	100.		µg/L	15.5	12/29/10 10:03	63210	1.00	XN
Trichloroethene	< 100.	100.		µg/L	14.6	12/29/10 10:03	63210	1.00	XN
Vinyl acetate	< 100.	100.		µg/L	10.5	12/29/10 10:03	63210	1.00	XN
Vinyl chloride	< 100.	100.		µg/L	22.0	12/29/10 10:03	63210	1.00	XN
1,3-Dichloropropene, Total	< 200.	200.		µg/L	19.0	12/29/10 10:03	63210	1.00	XN
Xylenes, Total	665.	300.		µg/L	30.0	12/29/10 10:03	63210	1.00	XN
Surrogates:									
1,2-Dichloroethane-d4	131	72-146		%REC	50.0	12/29/10 10:03	63210	1.00	XN
4-Bromofluorobenzene	109	60-126		%REC	50.0	12/29/10 10:03	63210	1.00	XN
d4-1,2-Dichlorobenzene	122	54-121	S	%REC	50.0	12/29/10 10:03	63210	1.00	XN
Dibromofluoromethane	101	60-126		%REC	50.0	12/29/10 10:03	63210	1.00	XN
Fluorobenzene	97.8	65-139		%REC	50.0	12/29/10 10:03	63210	1.00	XN
Toluene-d8	91.5	62-135		%REC	50.0	12/29/10 10:03	63210	1.00	XN

Qualifiers:

B - Analyte detected in the associated Method Blank
E - Estimated
H - Holding Time Exceeded
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
J - Analyte detected below quantitation limits

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin • Morton Grove, IL 60053-3203
847.967.6666 • 800.248.0663 • fax: 847.967.6735 • www.emt.com

Client: Badger Disposal of Wisconsin

Project: Badger Analysis

Lab Order: 10120609

DATES REPORT

1/6/2011

Sample ID	Client Sample ID	Collection Date	Matrix	Test Name	TCLP Date	Prep Date	Analysis Date	Batch ID
10120609-01A	CAT-1	12/28/10	Solid	ICP Metals, TCLP extraction	12/29/10 14:30	12/30/10 09:20	12/30/10 11:42	63226
				Mercury (Hg), TCLP Extracted	12/29/10 14:30	12/30/10 09:30	12/30/10 12:38	63231
10120609-02A	BDW-1		Liquid	ICP Metals in Groundwater, Total		12/29/10 11:30	12/29/10 11:31	63206
				Mercury, Groundwater Total		12/29/10 09:15	12/29/10	63214
				Semivolatiles by GC/MS		12/29/10 14:00	1/4/11 13:51	63236
				Volatiles by GC/MS		12/29/10 10:03	12/29/10 16:09	63222
10120609-03A	BDW-2			ICP Metals in Groundwater, Total		12/29/10 11:30	12/29/10 11:31	63206
				Mercury, Groundwater Total		12/29/10 09:15	12/29/10	63214
				Semivolatiles by GC/MS		12/29/10 14:00	1/4/11 14:35	63236
				Volatiles by GC/MS		12/28/10 15:25	12/29/10 08:57	63210
10120609-04A	BDW-3			ICP Metals in Groundwater, Total		12/29/10 11:30	12/29/10 11:31	63206
				Mercury, Groundwater Total		12/29/10 09:15	12/29/10	63214
				Semivolatiles by GC/MS		12/29/10 14:00	1/4/11 15:18	63236
				Volatiles by GC/MS		12/28/10 15:25	12/29/10 09:30	63210
10120609-05A	BDW-4			ICP Metals in Groundwater, Total		12/29/10 11:30	12/29/10 11:31	63206
				Mercury, Groundwater Total		12/29/10 09:15	12/29/10	63214
				Semivolatiles by GC/MS		12/29/10 14:00	1/4/11 16:01	63236
				Volatiles by GC/MS		12/29/10 10:03	12/29/10 17:15	63222
10120609-06A	BDW-5			ICP Metals in Groundwater, Total		12/29/10 11:30	12/29/10 11:31	63206

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

3160 North Austin • Morton Grove, IL 60053-3293
847.967.6666 • 800.246.0663 • fax: 847.967.6735 • www.emt.com

Client: Badger Disposal of Wisconsin
Project: Badger Analysis

DATES REPORT

1/6/2011

Lab Order: 10120609

Sample ID	Client Sample ID	Collection Date	Matrix	Test Name	TCLP Date	Prep Date	Analysis Date	Batch ID
10120609-06A	BDW-5	12/28/10	Liquid	Mercury, Groundwater Total		12/29/10 09:15	12/29/10	63214
				Semivolatiles by GC/MS		12/29/10 14:00	1/4/11 16:45	63236
				Volatiles by GC/MS		12/28/10 15:25	12/29/10 10:03	63210

Tote 1a & 1b.

BADGER DISPOSAL
Badger Disposal of WI, Inc.

LAB ANALYSIS

GENERATOR Badger Disposal of WI, Inc.

SAMPLE DESCRIPTION BDW-1

WASTE REC'D
DATE: 1/7/11
TIME: 1200
BY: JT

ANALYSIS COMPLETED BY: JT

DATE: 1/7/11 TIME: 1220

% SOLID ≤5

% LIQUID ≥95

VISCOSITY LOW

COLOR GREEN

PHASE LAYERING NO

pH _____ pH narrow range paper _____

pH METER: 3.96

FLASH POINT >140 @ 29.67" Hg

SPECIFIC GRAVITY _____

% WATER _____

% CHLORIDE _____

BTU's _____

Compatibility NO CHANGE

Tote 2 & 26.

BADGER DISPOSAL
Badger Disposal of WI, Inc.

LAB ANALYSIS

GENERATOR Badger Disposal of WI, Inc.

SAMPLE DESCRIPTION BDW-2

WASTE REC'D
DATE: 1/7/11
TIME: 1200
BY: JT

ANALYSIS COMPLETED BY: JT

DATE: 1/7/11 TIME: 1225

% SOLID ≤5

% LIQUID ≥95

VISCOSITY LOW

COLOR GREEN

PHASE LAYERING NO

pH _____ pH narrow range paper _____

pH METER: 4.34

FLASH POINT >140 @ 29.67" Hg

SPECIFIC GRAVITY _____

% WATER _____

% CHLORIDE _____

BTU's _____

Compatibility NO CHANGE

Tote 3a & 3b

BADGER DISPOSAL
Badger Disposal of WI, Inc.

LAB ANALYSIS

GENERATOR Badger Disposal of WI, Inc.

SAMPLE DESCRIPTION BDW-3

WASTE REC'D
DATE: 1/7/11
TIME: 1200
BY: JT

ANALYSIS COMPLETED BY: JT

DATE: 1/7/11 TIME: 1230

% SOLID ≤5

% LIQUID ≥95

VISCOSITY LOW

COLOR GREEN

PHASE LAYERING NO

pH _____ pH narrow range paper _____

pH METER: 4.24

FLASH POINT >140 @ 29.67" Hg

SPECIFIC GRAVITY _____

% WATER _____

% CHLORIDE _____

BTU's _____

Compatibility NO CHANGE

Tote 4a & 4b.

BADGER DISPOSAL
Badger Disposal of WI, Inc.

LAB ANALYSIS

GENERATOR Badger Disposal of WI, Inc.

SAMPLE DESCRIPTION BDW-4

WASTE REC'D
DATE: 1/7/11
TIME: 1200
BY: JT

ANALYSIS COMPLETED BY: JT

DATE: 1/7/11 TIME: 1235

% SOLID ≤5

% LIQUID ≥95

VISCOSITY LOW

COLOR GREEN

PHASE LAYERING NO

pH _____ pH narrow range paper _____

pH METER: 4.51

FLASH POINT >140 @ 29.67" Hg

SPECIFIC GRAVITY _____

% WATER _____

% CHLORIDE _____

BTU's _____

Compatibility NO CHANGE

Sludge Drum.

BADGER DISPOSAL
Badger Disposal of WI, Inc.

LAB ANALYSIS

GENERATOR Badger Disposal of WI, Inc.

SAMPLE DESCRIPTION BDW-5

WASTE REC'D
DATE: 11/7/11
TIME: 1200
BY: JT

ANALYSIS COMPLETED BY: JT

DATE: 11/7/11 TIME: 1240

% SOLID ≤5

% LIQUID ≥95

VISCOSITY LOW

COLOR GREEN

PHASE LAYERING NO

pH _____ pH narrow range paper _____

pH METER: 6.67

FLASH POINT >140 @ 29.67" Hg

SPECIFIC GRAVITY _____

% WATER _____

% CHLORIDE _____

BTU's _____

Compatibility NO CHANGE

CZ

Badger Disposal of WI, Inc.

Kandylee Schmit
Compliance Officer
kandy@badgerdisposal.com

866-271-0961
414-760-9175
Fax: 414-760-9189

5611 W. Hemlock St. Milwaukee, WI 53223

Licensed Treatment Storage & Disposal Facility

Land and Chemicals Division

Type of Document:
- Notice of Violation and Inspection Report/Checklist
- No Violation Letter and Inspection Report/Checklist
- Letter of Acknowledgment
- Information Request
- X Return to Compliance
- Inspection Report
- Pre-Filing and Opportunity to Confer
- State Notification of Enforcement Action

Facility Name : Badger Disposal of WI, Inc.

Facility Location: 5611 West Hemlock Street

City: Milwaukee **State:** WI

U.S. EPA ID# WID988580056

Assigned Staff: Bryan Gangwisch **Phone:** 6-0989

Name	Signature	Date
Author		11/2/10
Regional Counsel		
Section Chief		11/3/10
Branch Chief		11-3-10

MG 11/3

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make one copy of the contents of this folder for the official file; Note: original inspection report goes into file room.
3. Scan the letter and save the file in the appropriate share drive folder.
4. Mail the original certified mail.
5. Distribute office copies and cc's and bcc's by email.

Once the certified mail receipt is returned:

6. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room.
7. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
LR-8J

NOV 0 3 2010

CERTIFIED MAIL 7009 1680 0000 7667 0289
RETURN RECEIPT REQUESTED

Ms. Kandylee Schmit
Compliance Officer
Badger Disposal of WI, Inc.
5611 West Hemlock Street
Milwaukee, Wisconsin 53223

Re: Badger Disposal of WI, Inc.
EPA I.D. No.: WID988580056

Dear Ms. Schmit:

On June 15, 2010, a representative of the U.S. Environmental Protection Agency and the Wisconsin Department of Natural Resources (WDNR) inspected Badger Disposal of WI, Inc. (Badger Disposal), located in Milwaukee, Wisconsin. In response to the violations identified during the inspection, we issued a Notice of Violation to you on September 22, 2010. Subsequent to our Notice of Violation you submitted additional information regarding the identified violations in correspondence dated October 20, 2010.

This letter is to inform you that EPA has reviewed the referenced response, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations.

If you have any questions or concerns regarding this matter, please contact Bryan Gangwisch, of my staff, at (312) 886-0989.

Sincerely,

Paul J. Little
Acting Chief, RCRA Branch
Land and Chemicals Division

cc: John Schwabe, WDNR-SE District

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Kandylee Schmit
Compliance officer
Badger Disposal WI, Inc.
5611 West Hemlock Street
Milwaukee, Wisconsin 53223

COMPLETE THIS SECTION ON DELIVERY

A. ~~Rec~~eived by *(Please Print Clearly)* B. Date of Delivery NOV 08 2010

C. Signature NOV 08 2010
X Annette M Wong ☐ Agent ☐ ~~Addressee~~

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☑ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

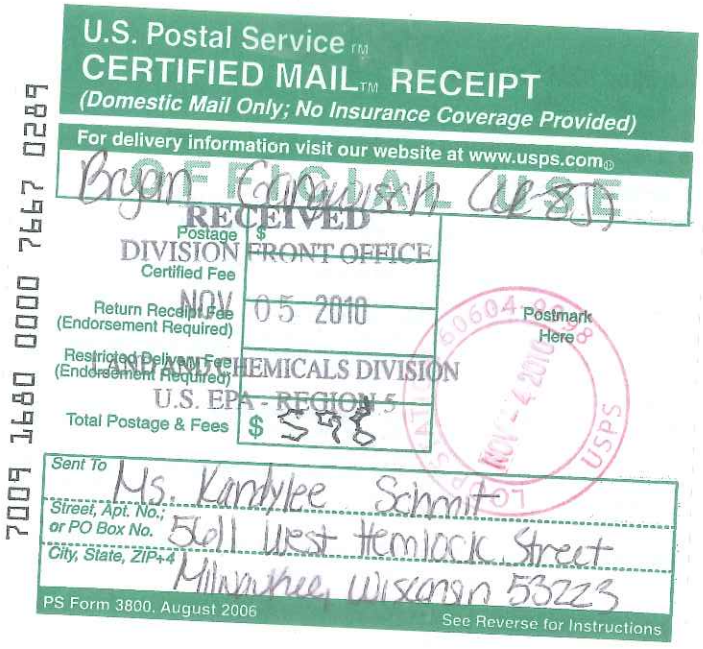
4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number
7009 1680 0000 7667 0289

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

bcc: Kasey Barton, ORC

bcc: Kasey Barton, ORC



BADGER DISPOSAL
Badger Disposal of WI, Inc.

October 20, 2010

Mr. Bryan Gangwisch
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard, LR-8J
Chicago, Illinois 60604

Dear Mr. Gangwisch,

This letter is a written response to a notice of violation that we received on September 24, 2010. The following is an explanation of actions Badger Disposal has taken to correct these violations.

1. EPA Federal permit condition II.C.2.a: Each container is clearly marked to identify its contents and the date each period of accumulation begins:

   At the time of the inspection, thirty six 55-gallon hazardous waste drums, which were received on June 11,2010, were not marked with an accumulation start date.

   As part of Badger Disposal's Standard Operating Procedure for incoming drums an inventory tag which indicates the generator, generator site address, generator contact, DOT Shipping name, storage code, manifest number, approval number and date received which is the accumulation start date is placed on each drum. This inventory tag has been added to our daily inspection form to make certain that every drum in storage has this tag. Copies of the inspection forms are included for your review. Badger Disposal will make every effort to assure that each drum is clearly marked to identify its contents and the date each period of accumulation begins.

2. Failure to comply with FPOR General Condition 1, and WAC, NR 664.0016(4)© and 40 C.F.R. 264.16(d)(3):

   At the time of the inspection it was found that Badger Disposal did not have records of a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management.

   Badger Disposal has developed a form that includes a written description of the type and amount of introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management.

5611 W. Hemlock St. Milwaukee, WI 53223
866-271-0961 • 414-760-9175 • Fax: 414-760-9189 • www.badgerdisposal.com

This form is placed in each employees training file. A copy of this form is included for your review.

If you have any questions regarding this response please contact Kandylee Schmit at 414-760-9175.

Sincerely,
Badger Disposal of WI., Inc.

Kandylee Schmit
Compliance Officer

Cc: John Schwabe – WIDNR SE District

Badger Disposal Lab Pack Bldg. Container Storage Area Inspection Log

Week of Inspection: _____ Name of Inspector _____

	Date	Time
Mon.		
Tues.		
Wed.		
Thurs.		
Fri.		

Check Item	M	T	W	TH	F	Comments
General Housekeeping • Cleanliness • Aisle Space • Open Lids • Leaks • Corrosion						
Containment Integrity • Cracks • Deterioration • Dampness						
Absorbent Materials • Low Supply						
Dock Areas • Leaking • Dampness						
Loading Dock Ramp • Condition • Operable						
Overhead Door • Operable • Locks Working						
Containers • In good condition • Labeled properly • Inventory Tag						
Repackaging Areas/Containment Areas (Storage) • Cleanliness • Placards						
Unloading/Loading Docks • Cleanliness • Containment • Integrity						

Badger Disposal Container Storage Area Inspection Log

Week of Inspection: _____ Name of Inspector _____

	Date	Time
Mon.		
Tues.		
Wed.		
Thurs.		
Fri.		

Check Item	M	T	W	TH	F	Comments
General Housekeeping • Cleanliness • Aisle Space • Open Lids • Leaks • Corrosion						
Containment Integrity • Cracks • Deterioration • Dampness						
Absorbent Materials • Low Supply						
Dock Areas • Leaking • Dampness						
Loading Dock Ramp • Condition • Operable						
Overhead Door • Operable • Locks Working						
Containers • In good condition • Labeled properly • Inventory Tag						
Repackaging Areas • Cleanliness • Placards						
Unloading/Loading Docks • Cleanliness • Containment • Integrity						

TRAINING AND RECORDKEEPING								
Employee Name: Raymond Kosmeder								
Job Title: Warehouse Technician								
Training Necessary for this Job: Introductory, DOT 232								
Site Security,DOT 8 hour Refresher, Hazardous Mgmt.								
Procedure Review, OSHA HAZWOPER								
	Date	Retraining Cycle	Retraining Dates					
EMPLOYEE SAFETY TRAINING RECORD								
Introductory: Facility Overview	9/25/09							
Contingency Plan								
Health and Safety								
Safety Equipment								
Truck Unloading Procedure								
Drum Handling								
Bulking Procedures								
Paperwork Overview								
DOT HM232 Security Plan Training	10/26/09	Annual						
DOT 8 Hour Refresher	3/24/10	3 years						
Hazardous Waste Management Procedure Review:	12/15/09	Annual						
Emergency Spill Response								
SPCC Plan								
Emergency Equipment								
Alarm Systems								
Contingency Plan								
Stormwater Runoff								
Tanker Guidelines/Regulations								
Loading/Unloading Procedures								
Fire Response								
Inorganic Warehouse Safety Equipment Overview								
Non-Hazardous Warehouse Overview								
OSHA HAZWOPER Training:	12/16/09	Annual						
Safety								
Hazard Communication								
PPE								
Respirator								
Eye & Hand Protection								
Toxicology								

Land and Chemicals Division

Type of Document: X Notice of Violation and Inspection Report/Checklist
No Violation Letter and Inspection Report/Checklist
Letter of Acknowledgment
Information Request
Return to Compliance
Inspection Report
Pre-Filing and Opportunity to Confer
State Notification of Enforcement Action

Facility Name : Badger Disposal of WI, Inc.

Facility Location: 5611 West Hemlock Street

City: Milwaukee **State:** WI

U.S. EPA ID# WID988580056

Assigned Staff: Bryan Gangwisch **Phone:** 6-0989

Name	Signature	Date
Author		9/14/10
Regional Counsel	Kasey Barton	9/16/10
Section Chief		9-21-10
acting Branch Chief		9-22-10

KG 9/21

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make one copy of the contents of this folder for the official file; Note: original inspection report goes into file room.
3. Scan the letter and save the file in the appropriate share drive folder.
4. Mail the original certified mail.
5. Distribute office copies and cc's and bcc's by email.

Once the certified mail receipt is returned:

6. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room.
7. E-mail staff the date that the letter was received by facility.

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com®

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$ 7.00

Postmark Here

SEP 23 2010

RECEIVED
DIVISION FRONT OFFICE
SEP 24 2010
U.S. EPA REGION

7009 1680 0000 7665 5200

Sent To Ms. Kandylee Schmit
Street, Apt. No.; or PO Box No. 5611 West Hemlock Street
City, State, ZIP+4 Milwaukee, Wisconsin 53223

PS Form 3800, August 2006 See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Kandylee Schmit
Compliance Officer
Badger Disposal of WI, Inc.
5611 West Hemlock Street
Milwaukee, Wisconsin 53223

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* B. Date of Delivery SEP 27 2010

C. Signature
X Annette M Wagner ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☑ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Copy from s...)* 7009 1680 00[illegible] 7665 5200

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

UNITED STATES POSTAL SERVICE

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Bryan Gangwish
USEPA (LR-8J)
77 W Jackson Blvd.
Chicago, IL 60604

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SEP 2 2 2010

LR-8J

CERTIFIED MAIL 7009 1680 0000 7665 5200
RETURN RECEIPT REQUESTED

Ms. Kandylee Schmit
Compliance Officer
Badger Disposal of WI, Inc.
5611 West Hemlock Street
Milwaukee, Wisconsin 53223

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Badger Disposal of WI, Inc.
EPA I.D. No.: WID988580056

Dear Ms. Schmit:

On June 15, 2010, the U.S. Environmental Protection Agency and the Wisconsin Department of Natural Resources (WDNR) conducted an inspection at Badger Disposal of WI, Inc. (Badger Disposal), located in Milwaukee, Wisconsin. The purpose of the inspection was to evaluate Badger Disposal's compliance with the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 et. seq., and its implementing regulations; specifically, those regulations related to the generation, treatment, and storage of hazardous waste by a licensed facility and large quantity generator of such wastes. Please find an enclosed copy of the EPA inspection report and checklists for your reference.

Badger Disposal is engaged in the management of hazardous waste with a RCRA hazardous waste treatment and storage license and is a large quantity generator. Based on information provided by Badger Disposal's personnel, a review of records and personal observations by the inspectors, EPA finds that Badger Disposal is in violation of certain requirements of the United States Code of Federal Regulations (C.F.R.), the Wisconsin Administrative Code (WAC), the facility's WDNR Hazardous Waste Storage-Container and Treatment-Container Commercial Licenses issued on October 1, 2009 (both of which incorporate the WDNR approved August 7, 2007 Feasibility and Plan of Operation Report), and the facility's Federal portion EPA Hazardous Waste permit issued on August 1, 2007. Specifically, Badger Disposal is in violation of the following requirements:

1. An owner and operator of a hazardous waste storage and treatment facility and a large quantity generator must clearly mark each container to identify its contents and must ensure that the date upon which each period of accumulation begins shall be clearly marked and visible for inspection on each container. See, EPA Federal permit condition II.C.2.a [40 C.F.R. § 268.50].

   During the inspection of the North Drum Warehouse, the inspectors observed that there were thirty-six 55-gallon hazardous waste drums, which were received on June 11, 2010, that had not been marked with an accumulation start date. Badger Disposal, therefore, failed to comply with EPA Federal permit condition II.C.2.a [40 C.F.R. § 268.50].

2. An owner and operator of a hazardous waste storage and treatment facility and a large quantity generator must maintain documents and records of a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management. See, WDNR approved August 7, 2007 Feasibility and Plan of Operation Report (FPOR) General Condition 1, and WAC, NR § 664.0016(4)(c) [40 C.F.R. § 264.16(d)(3)].

   During the inspection of records, the inspectors observed that there were no records provided that documented the type and amount of both introductory and continuing training to be given to each employee filling a position related to hazardous waste management. Badger Disposal, therefore, failed to comply with FPOR General Condition 1, and WAC, NR § 664.0016(4)(c) [40 C.F.R. § 264.16(d)(3)].

Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office documenting the actions, if any, which have been taken since the inspection to establish compliance with the above license conditions and requirements.

You should submit your response no later than thirty (30) days after receipt of this letter to Bryan Gangwisch, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions or concerns regarding this letter, please contact Bryan Gangwisch, of my staff, at 312-886-0989.

Sincerely,

Paul J. Little
Acting Chief, RCRA Branch
Land and Chemicals Division

Enclosures

cc: John Schwabe - WDNR SE District

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Badger Disposal of WI, Inc.

EPA ID No.: WID988580056

ADDRESS: 5611 West Hemlock Street
Milwaukee, WI 53223

DATE OF INSPECTION: June 15, 2010

EPA INSPECTOR: Bryan Gangwisch

PREPARED BY: _____ 6/24/10
Bryan Gangwisch — Date Completed
Environmental Scientist
Compliance Section #2

ACCEPTED BY: _____ 6-24-10
Paul Little, Chief — Date
Compliance Section #2

bcc: Kasey Barton, ORC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Badger Disposal of WI, Inc.

EPA ID No.: WID988580056

ADDRESS: 5611 West Hemlock Street
Milwaukee, WI 53223

DATE OF INSPECTION: June 15, 2010

EPA INSPECTOR: Bryan Gangwisch

PREPARED BY: _____ 6/24/10
Bryan Gangwisch — Date Completed
Environmental Scientist
Compliance Section #2

ACCEPTED BY: _____ 6-24-10
Paul Little, Chief — Date
Compliance Section #2

Purpose of Inspection

This inspection was an evaluation of Badger Disposal of WI, Inc. (Badger Disposal), and its compliance with hazardous waste regulations found at Wisconsin Administrative Code (WAC), requirements/conditions journalized in the August 7, 2007, Wisconsin Department of Natural Resources (WDNR) authorized RCRA Feasibility Determination and Plan of Operation and operating license, and requirements journalized in the August 1, 2007, U.S. Environmental Protection Agency authorized RCRA permit and the Code of Federal Regulations (CFR). I performed the inspection with John Schwabe of the WDNR. The inspection was an EPA lead RCRA Compliance Evaluation Inspection (CEI).

Participants

Kandylee Schmit, Compliance Officer	Badger Disposal
Ron Mitchell, General Manager	Badger Disposal
Henry J. Krier, President	Badger Disposal
John Schwabe, Waste Management Specialist	WDNR
Bryan Gangwisch, Environmental Scientist	U.S. EPA

Introduction

The inspectors arrived at the site on June 15, 2010, at approximately 8:30 a.m. The weather consisted of cloudy conditions with a light wind, and an ambient air temperature of approximately 72 degrees Fahrenheit. We introduced ourselves, presented our inspector credentials and identification, and described the purpose of the inspection and the process by which we intended to conduct the inspection. Ms. Schmit provided us with a verbal description of the site, led the tour throughout the facility, and then attempted to provide us with the records we requested for review.

Site Description

Badger Disposal was operating as a licensed hazardous waste storage, treatment and transfer facility and a large quantity generator at the time of the inspection according to Ms. Schmit, a WDNR annual hazardous waste report, and a U.S. EPA database. The Badger Disposal Wisconsin Hazardous Waste Facility Storage Container License No. is 6026 and was renewed and became effective on October 1, 2009, and expires on September 30, 2010. The current storage license allows the facility to store hazardous waste in containers and to conduct closure/post closure and corrective action activities. Badger Disposal also retains four other WDNR issued licenses including: Hazardous Waste Treatment – Container Commercial License No. 4395, effective October 1, 2009, and expires on September 30, 2010; Hazardous Waste Transporter – PCB – Full Service Contractor License No. 12685, effective October 1, 2009, and expires on September 30, 2010; Solid Waste Transfer Facility – Small License No. 3386, effective October 1, 2009, and expires on September 30, 2010; and a Solid Waste Transporter

License No. 14579, effective October 1, 2009, and expires on September 30, 2010. Also, the U.S. EPA joint portion (Subpart CC) of the license became effective on August 1, 2007, and expires on August 1, 2017.

The facility began operations as EOG Disposal on September 1, 1990. A hazardous waste facility interim license was issued to EOG Disposal on March 15, 1994. The initial hazardous waste facility operating license was issued to EOG Disposal on December 16, 1996. In early 2003, the name of the facility changed from EOG Disposal to Badger Disposal as a result of an ownership change. On May 6, 2003, the WDNR approved a Class 1 license modification recognizing the ownership and name change.

Badger Disposal is located on approximately 4 ½ acres of land. Badger Disposal is immediately surrounded by manufacturing, warehousing and other commercial activities. Badger Disposal serves over 900 clients of commercial, institutional, governmental and industrial companies primarily from Wisconsin, Minnesota, Illinois and Iowa.

Badger Disposal currently operates a licensed hazardous waste and non-hazardous waste storage and treatment facility within the following three buildings: North Drum Warehouse; South 2007 Warehouse Addition; and the Lab Pack Building (only non-hazardous waste and used oil storage at the time of inspection). There is also a laboratory, reception area and administrative offices on-site.

The North Drum Warehouse and the 2007 Warehouse Addition is constructed of 12-inch thick outside walls and reinforced concrete floors. Six-inch high, ten-inch thick concrete berms are constructed where exits from the regulated storage area to non-containment areas exist. A 4-hour rated fire wall has been constructed with automatic fire doors which will close if excessive heat is detected, isolating the hazardous waste processing and storage area from the laboratory and office area.

The primary function of Badger Disposal is the bulking and transfer of hazardous and non-hazardous waste for recycling, fuel blending and other waste management methods. The majority of the wastes received at Badger Disposal are organic hazardous wastes (F001, F002, F003, F005 and D001 hazardous wastes) and non-hazardous wastes that are shipped off-site to be recycled or burned as a fuel in industrial furnaces. Badger Disposal is also approved to store corrosive, reactive and toxic characteristic hazardous wastes (D002-D043 hazardous wastes), F-listed hazardous wastes, K-listed hazardous wastes and toxic and acute commercial chemical products and manufacturing chemical intermediates (U- and P- listed hazardous wastes). Wastes that are not burned as fuel are bulked for off-site metal recovery, neutralization and other waste management methods. Containers of waste that are not bulked are stored on-site until enough accumulate for an economical shipment off-site.

Badger Disposal accepts containers of lab-packed waste into its storage facility. The small containers in the lab packs are not emptied, but are re-packed into larger lab pack containers before they are shipped to off-site treatment, storage or disposal facilities (TSDFs). The lab pack

container is re-packed while it is located on a spill containment pallet to minimize potential spills. The lab pack operations are performed in designated areas that are placarded and delineated by markings on the floor. Badger Disposal punctures aerosol cans using a puncturing device which de-pressurizes the cans and allows them to drain. The liquid contents of the aerosol cans are drained into a 55-gallon container and may be fuel blended. The drained aerosol cans are sent off-site for metal recycling.

Before containers of hazardous waste are shipped to Badger Disposal, a waste profile form is completed by the generator. The waste profile includes generator information, a waste description, general characteristics and composition such as viscosity, % water, total suspended solids, pH, BTU's, flash point, halogens, and metals content. Generators are required to re-submit waste identification forms annually. Profiles for containers of lab packed waste include an inventory list of laboratory chemicals packed in each drum. After the waste is received by Badger Disposal, the waste is sampled and analyzed to verify the properties of the waste stated on the waste profile form.

Badger Disposal also blends hazardous wastes so they can be burned as a fuel in off-site boilers and industrial furnaces, such as cement kilns. Containers of hazardous waste that are selected for fuel blending are staged inside the bermed North Drum Warehouse near Dock 2 located on the east side of the North Drum Warehouse Building. A 6,000-gallon vacuum truck trailer is backed over the berm and the contents of the selected drums are pumped into the trailer while it is parked within the containment area of the North Drum Warehouse Building. The entire containment floor area is chemically sealed with an impervious coating as stated by Ms. Schmit. A liquid level control on the tanker indicates when the tanker is full. Before transport, a sample of the material in the tanker is obtained and analyzed to determine if the mixture meets fuel blending specifications. The valves are closed and capped and the trailer is inspected to make sure it is not leaking. A new manifest accompanies the outbound shipment which is transported to an approved cement kiln for use as a secondary fuel. Empty containers generated by pumping the waste into the vacuum truck are either crushed or stored at Badger Disposal until they are shipped to a drum recycler.

The maximum storage capacity in the North Drum Warehouse Building is 720 fifty-five gallon containers or 39,600 gallons (including the 6,000-gallon vacuum truck) of hazardous waste. The maximum storage capacity in the 2007 Warehouse Addition is 492 fifty-five gallon containers or 27,060 gallons of non-ignitable, non-reactive, acidic, basic and inorganic (F006) hazardous waste. The maximum storage capacity in the proposed (already constructed and in use for non-hazardous waste) Lab Pack Building is 145 fifty-five gallon containers or 7,975 gallons of hazardous waste. Ms. Schmit stated that the facility license modification for the approved Lab Pack Building was in the process with WDNR at the time of inspection. Ms. Schmit stated that currently, until modification approval, there is only non-hazardous solid waste and non-hazardous waste lab packs stored in the Lab Pack Building. Ms. Schmit also stated that the WDNR agreed to Badger Disposal not needing to store all liquid hazardous wastes and lab pack drums on spill containment pallets that have the capacity to situate six to eight 55-gallon drums.

The containers that are used to manage hazardous waste at Badger Disposal consist of 5, 10, 14, 20, 30, 55, 85-gallon drums, 275-gallon totes and cubic yard bags and boxes. There are no hazardous waste tanks at the facility as stated by Ms. Schmit.

The main waste streams generated at Badger Disposal consist of: solid hazardous waste residue (gets shipped to Safety-Kleen-Dolton) from the pumping of fuel blended waste into the tankers and gloves and personal protective equipment as stated by Ms. Schmit. There are multiple hazardous waste codes associated with the main waste types that Badger Disposal accepts for treatment/storage and transfer, per their waste analysis plan (WAP). Spent fluorescent light bulbs and batteries were being accumulated and stored for transfer to other facilities for recycling as stated by Ms. Schmit. The used oil is stored in 55-gallon drums and is utilized in the fuel blending process on-site as stated by Ms. Schmit. The F006 received hazardous waste is stored in cubic yard boxes and is shipped to either Envirite or EQ Detroit as stated by Ms. Schmit.

Ms. Schmit stated that the generated hazardous waste fuels are turned around in just days, while the acids, bases, and other inorganic wastes are typically stored at the facility for approximately 3-4 months, except for F006 which is shipped typically every 3-4 weeks from the received date. Also, the lab packs are typically stored for the longest time at the facility as stated by Ms. Schmit.

Ms. Schmit stated that 90 % of all operations that occur at Badger Disposal consist of fuel blending related activities. Approximately 2-4 tanker trucks with generated blended fuels leave the facility per week as stated by Ms. Schmit. Badger Disposal utilizes five approved cement kilns to send hazardous waste blended fuels to, as stated by Ms. Schmit and they consist of: Green America Recycling, LLC; Greencastle WDF Facility; Lone Star Industries; Essroc; and Safety-Kleen-Dolton. Ms. Schmit stated that Subpart CC was applicable to Badger Disposal and the EPA Subpart CC air emissions permit was current.

Badger Disposal is also licensed as a hazardous waste transporter and utilizes all box trucks that have the capacity for 80-85 fifty-five gallon drums as stated by Ms. Schmit. The vacuum tanker trucks are supplied by a sub-contractor as stated by Ms. Schmit.

The facility also had a current storm water permit as stated by Ms. Schmit. Storm water permit inspections of the three catch basins occur quarterly and annually as stated by Ms. Schmit. The facility does not have any other air or wastewater treatment permits and does not conduct any chemical treatment of wastes as stated by Ms. Schmit. There have been no reportable hazardous waste spills or fires at the facility as stated by Ms. Schmit.

There are approximately 14 total employees that work one 8-hour shift as stated by Ms. Schmit. Ms. Schmit also stated that of the total 14 employees, seven or eight employees are involved with hazardous waste and RCRA management. The "Unauthorized Entry" signs were posted on-site and a site security plan was in place as stated by Ms. Schmit. The active portion of the facility was fenced in, empty drums were being stored in truck trailers, there is a 24-hour camera

surveillance/security system in place which is operated internally, and all the entrance/exit gates are equipped with key-code access controls.

Site Tour

The physical walkthrough of the site began at approximately 9:30 a.m. We started at the Lab Pack Building. Ms. Schmit stated that there were proposed license modifications with the WDNR for the future storage of hazardous waste in this building. There was a highly toxics storage area that was bermed (separate enclosed room that was empty at the time of inspection). Also, the modification included an enclosure/shipping dock for this building as stated by Ms. Schmit. All the waste/used oil in this building was non-hazardous waste as stated by Ms. Schmit. Also, all the containers/boxes were labeled as "Non-Hazardous Waste", "Universal Waste" or "Used Oil" (only 1 drum). There also were spent computer parts and CRTs in storage that gets shipped to Janesville, Wisconsin, for recycling as stated by Ms. Schmit. There were several boxes that contained universal waste fluorescent bulbs that were labeled as "Universal Waste Used Bulbs", were closed, and were dated within one year, except for three boxes that did not have accumulation start dates marked on them. However, after Ms. Schmit cross-checked the received dates (through the Terralink internal incoming tracking system) for the three universal waste boxes from the respected generators, Badger Disposal confirmed that the three boxes were stored within one year. There were several 55-gallon non-hazardous waste drums. There were empty drums and cubic yard super sacks. There was one 20 cubic-yard roll-off box that contained non-hazardous solid waste (plastic materials) that gets shipped to Advanced Waste in Milwaukee, Wisconsin as stated by Ms. Schmit. This building is equipped with a fire alarm, AFFF foam system, fire extinguishers and explosion proof lighting. The fire extinguishers are inspected by County Wide, and the fire alarms are annually inspected by ADT as stated by Ms. Schmit. There were elevator-type phones in place that are also inspected by ADT. The fire suppression system is inspected and Engine No. 9 is the site first responder as stated by Ms. Schmit. The employees that work in this building are equipped with cell phones and an air horn was in place. There was an eye wash and a spill kit in the vicinity.

Next, we inspected the North Drum Warehouse. We started at the North Drum Warehouse Lab where Ms. Schmit and Mr. Mitchell explained the sample process for the different waste streams. The inspectors then observed the foam suppression system. Mr. Mitchell stated that the North Drum Warehouse was equipped with 4-hour rated fire walls, fire doors, and was boiler heated. There was also a mobile foam fire extinguisher and over pack drums filled with vermiculite. There were no drains in this building as stated by Mr. Mitchell. Employees that work in this building are equipped with two way radios and cell phones as stated by Mr. Mitchell. The inspectors observed the area where fuels are blended into a tanker truck. The area was bermed, the floor was sealed chemically (impervious) and several over pack drums were in the vicinity. Mr. Mitchell stated that prior to blending, the compatibility of the waste steams are evaluated by direct mixing of samples of wastes that are to be commingled. The flammable waste storage side was on the north side of the building and there were six rows (two 55-gallon drums wide) of organic hazardous waste selected to be fuel blended in storage in 55-gallon drums situated on spill containment pallets. There were thirty-six 55-gallon hazardous waste drums, within these six rows, which were received on June 11, 2010, but had not yet been processed/sampled as

stated by Mr. Mitchell. The procedures during processing/sampling generate tags (that are placed on each drum) that track when the hazardous waste is received at the facility and thus the accumulation start date of storage time as stated by Mr. Mitchell. Since these 36 drums had not been processed, they had not been marked with an accumulation start date. Pictures were taken. All the other hazardous waste drums in the six rows were labeled as "Hazardous Waste", dated within one year (per license condition), and were closed. There were ten rows (two 55-gallon drums wide) of flammable hazardous waste in 55-gallon drums situated on spill containment pallets. All of these hazardous waste containers were labeled as "Hazardous Waste", dated within one year, and were closed. The lab pack operations in the building consisted of smaller containers (no opening of these during re-packing) of hazardous waste being re-packed into mainly 55-gallon drums as stated by Mr. Mitchell. The majority of the lab pack waste gets shipped to WTI Heritage in East Liverpool, Ohio, as stated by Mr. Mitchell. There were five rows (two 55-gallon drums wide) of re-packed lab pack hazardous waste in 55-gallon drums situated on spill containment pallets. There were two rows of non-hazardous waste drums. There also were eight rows of different sized hazardous waste containers that were situated in the lab pack processing area. Of those eight rows, 3 rows of which were dedicated to oxidizer storage- at least 20 feet from flammable waste storage as stated by Mr. Mitchell. All lab pack hazardous waste containers were labeled as "Hazardous Waste", dated within one year, and were closed. Mr. Mitchell stated that there are approximately 750-800 fifty-five gallon drums going in and out of this building per week. There also were PCB transformers situated on one spill containment pallet; five rows (two 55-gallon drums wide) of organic hazardous waste (blending type fuels) in 55-gallon drums situated on spill containment pallets; and two rows (two 55-gallon drums wide) of inorganic hazardous waste in 55-gallon drums situated on spill containment pallets that was received today (the day of the inspection) and was being shipped to EQ Detroit tomorrow as stated by Mr. Mitchell. These hazardous waste containers were labeled as "Hazardous Waste", dated, and were closed. Pictures were taken of the storage configurations.

Next, we inspected the 2007 South Addition to the Drum Warehouse. There were no drains in this attached building, and the containment floor area was bermed, and was chemically resistant sealed as stated by Mr. Mitchell. At the west end of the building, there was storage of bases, toxics and non-ignitable hazardous waste such as F006. At the east end of the building, there was storage of acids. There were fifteen rows (two 55-gallon drums wide) of basic hazardous waste in 55-gallon drums situated on spill containment pallets, and sixteen rows (two 55-gallon drums wide) of acidic hazardous waste in 55-gallon drums situated on spill containment pallets. All hazardous waste containers in this building were labeled as "Hazardous Waste", dated within one year, and were closed. There were spill containment supplies in the vicinity. There also was an eye wash station and fire extinguishers in this building. Mr. Mitchell and Ms. Schmit stated that employees in this building are equipped with two way radios and cell phones. Pictures were taken of the storage configuration.

Next, Mr. Mitchell explained waste analysis plan procedures in more detail for different waste streams and showed the inspectors Badger Disposal's fuel analysis form and an example of a load summary sheet.

RCRA Subpart CC (Level 1 and 2 controls) did apply to hazardous waste storage containers. Mr. Mitchell explained the following Subpart CC controls, waste transfer, and operating procedures that Badger Disposal performs when filling a tanker truck with hazardous waste fuel. An exhaust hookup is utilized that blows the vapors, from the displacement of fuel being pumped into the tanker, into an 85-gallon over pack drum as stated by Mr. Mitchell. The hazardous waste fuels are pumped from a drum into the bottom of the tanker truck to minimize exposure of the waste vapors to the atmosphere as stated by Mr. Mitchell. Badger Disposal uses a submerged-fill pipe to load hazardous waste Subpart CC applicable liquids into level 2 containers.

The drums and totes of Subpart CC applicable hazardous waste that are received at Badger Disposal are inspected when they arrive to make certain they are sealed and to make certain they remain closed when in storage. All containers are equipped with a cover and closure device that forms a continuous barrier over the container opening such that when the cover and closure devices are secured in the closed position there are no visible holes, gaps or other open spaces into the interior of the containers. Sampling of containers and removal of container contents occurs through the bore holes on the drum lid via insertion of a drum pump. Liquid wastes are received and shipped out by tanker truck in a closed-loop operation that does not result in emissions.

Record Review

Mr. Mitchell led the inspectors into his office to review hazardous waste container and security and communication inspection logs. Mr. Mitchell stated that Marty Schmit (Plant Manager) and he conduct the inspections. Mr. Schmit conducts the security and communication inspections and records them into a log weekly. All of the weeks were documented and present. Mr. Mitchell conducts the weekly hazardous waste container inspections and records the inspections into a log. The weekly documented inspections of hazardous waste storage containers were reviewed by the inspectors. All of the weeks were documented and were kept on file for at least the last three years. The hazardous waste storage container inspections followed the inspection schedule as required by the license. Mr. Schmit also conducts and documents the inspections of the hazardous waste fuel tanker trucks when they are present.

The inspectors reviewed the outbound manifests generated by Badger Disposal. Each hazardous waste fuels manifest included the fuels analysis form generated at Badger Disposal. The most recent manifests show that all hazardous waste is sent to the following TSDFs: Green America Recycling, LLC (MOD054018288); CRT Processing Corporation (WIR000126664); Envirite (ILD000666206); Heritage-WTI, Inc. (OHD980613541); American Ref-Fuel Company (NYD986930543); Greencastle WDF Facility (IND006419212); Lone Star Industries (MOD981127319); EQ Detroit (MID980991566); Michigan Disposal Waste Treatment Plant (MID000724831); Veolia Environmental Services, LLC (WID988566543); Mercury Waste Solutions (WIR000000356); Veolia Environmental Services, LLC (TXD000838896); Stablex Canada (NYD980756415) in Blainville, Province of Quebec, Canada; Safety-Kleen-Dolton (ILD980613913); Ross Incineration (OHD048415665); Essroc (IND005081542); Veolia

Environmental Services, LLC (ILD098642424); Wayne Disposal, Inc. (MID048090633); and Environmental Enterprises, Inc. (OHD083377010). The following transporter was also used: Badger Disposal (WID988580056). All export notices and certificates were available for review on each manifest for each waste stream. The 2009 export/annual report (No. 581/09) was available for review. The manifests were retained on file for at least the last three years. There were LDRs available for each waste stream on each manifest or one-time notifications on file. These manifests were kept in the same office as the inspection logs. The inbound manifests were kept in the main office.

The closure cost estimates was previously inspected. The most recent total closure cost estimate was $215,000. These estimates were updated as of 12/2/09.

The Certificate of Insurance and Liability for closure was previously inspected. The most recent certificate, dated 5/3/10, indicated that Badger Disposal had sufficient liability coverage as required by the permit, for occurrences that could arise at the facility.

The initial 40-hour hazardous waste training at Badger Disposal is provided (off-site) to all employees involved in the hazardous waste management process as stated by Ms. Schmit. The RCRA training (and Department Of Transportation training) and annual refreshers are administered in-house and documented. Mr. Mitchell and Sue Ingram conduct the annual RCRA trainings as stated by Ms. Schmit. The content of the hazardous waste training program included contingency plan implementation; procedures for replacing emergency equipment; communications and alarm systems; response to fires or explosions; response to groundwater contamination incidents; and shutdown of operations and all other areas as required by the license. The documentation of training record requirements were available and included the following: job descriptions for each job title related to hazardous waste management, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position; and documented annual RCRA hazardous waste management training. However, there were no records provided that documented the type and amount of both introductory and continuing training to be given to each employee filling a position related to hazardous waste management. The recent dates of provided and documented annual RCRA trainings are as follows: December 18, 2008; December 15, 2009; and January 11, 2010. Hazardous communication (haz-com) training is also occurring at the facility as stated by Ms. Schmit.

There was a contingency plan in place for the facility. The most recently updated (8/21/09) plan included the following: actions to be taken in response to fires or explosions; procedures for emergency shutdown; description of the site layout including all hazardous waste storage locations; emergency equipment capabilities and locations for fire extinguishers, pull-alarm locations, and eyewash locations and all other areas as required by the license. Copies of the contingency documents have been sent to all local emergency authorities as stated by the plan in the past.

The waste analysis plan (WAP) was previously inspected and the most recent approved waste analysis procedures set forth in the WAP in Appendix D of the March 17, 2006, Feasibility Plan

of Operations Report (FPOR) as documented in the August 7, 2007, operating license/plan approval by WDNR.

The most recent inbound manifests show that all hazardous waste is sent to Badger Disposal. Each inbound manifest included a waste stream profile sheet from the generator who sent the manifest. The manifests were retained on file for at least the last three years. There were LDRs available for each waste stream on each manifest or one-time notifications on file.

Waste determinations were documented for all hazardous and non-hazardous waste streams and were documented through the on-site WDNR certified laboratory or generator knowledge.

Badger Disposal had documented procedures that outlined RCRA Subpart CC (Level 1 and 2 controls) controls, waste transfer, operating, inspection, and repair requirements for the hazardous waste storage containers.

Closing Conference

We summarized the accumulation date and RCRA training element documentation issues identified during the inspection. The inspection concluded at approximately 12:45 p.m.

Documents received during this inspection are as follows:

- Copies of the Badger Disposal Analysis Form and Load Summary Information Sheet
- A copy of Badger Disposal's Tanker Truck and Loading Area Inspection Log
- A copy of the Badger Disposal facility "General Information" booklet
- A copy of pages 3-7; 3-8; 4-4; 4-5; and 4-6 of Badger Disposal's March 2006 and revised September 15, 2006 FPOR, which included the documented procedures for the facility's Subpart CC controls and operations

Documents given to Badger Disposal during this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)
- State Pollution Prevention contact handout

A photo log is attached consisting of eleven (11) photos taken by U.S. EPA during the inspection.

1. A view, at the North Drum Warehouse, of thirty-six 55-gallon hazardous waste drums, which were received on June 11, 2010, but had not yet been processed/sampled. Since these 36 drums had not been processed, they had not been marked with an accumulation start date.

Badger Disposal of WI, Inc., Milwaukee, WI
Bryan Gangwisch, U.S. EPA 6/15/10

2. A view, at the North Drum Warehouse, of some of the above-referenced (photo # 1) thirty-six 55-gallon hazardous waste drums, which were received on June 11, 2010, but had not yet been processed/sampled. Since these 36 drums had not been processed, they had not been marked with an accumulation start date.

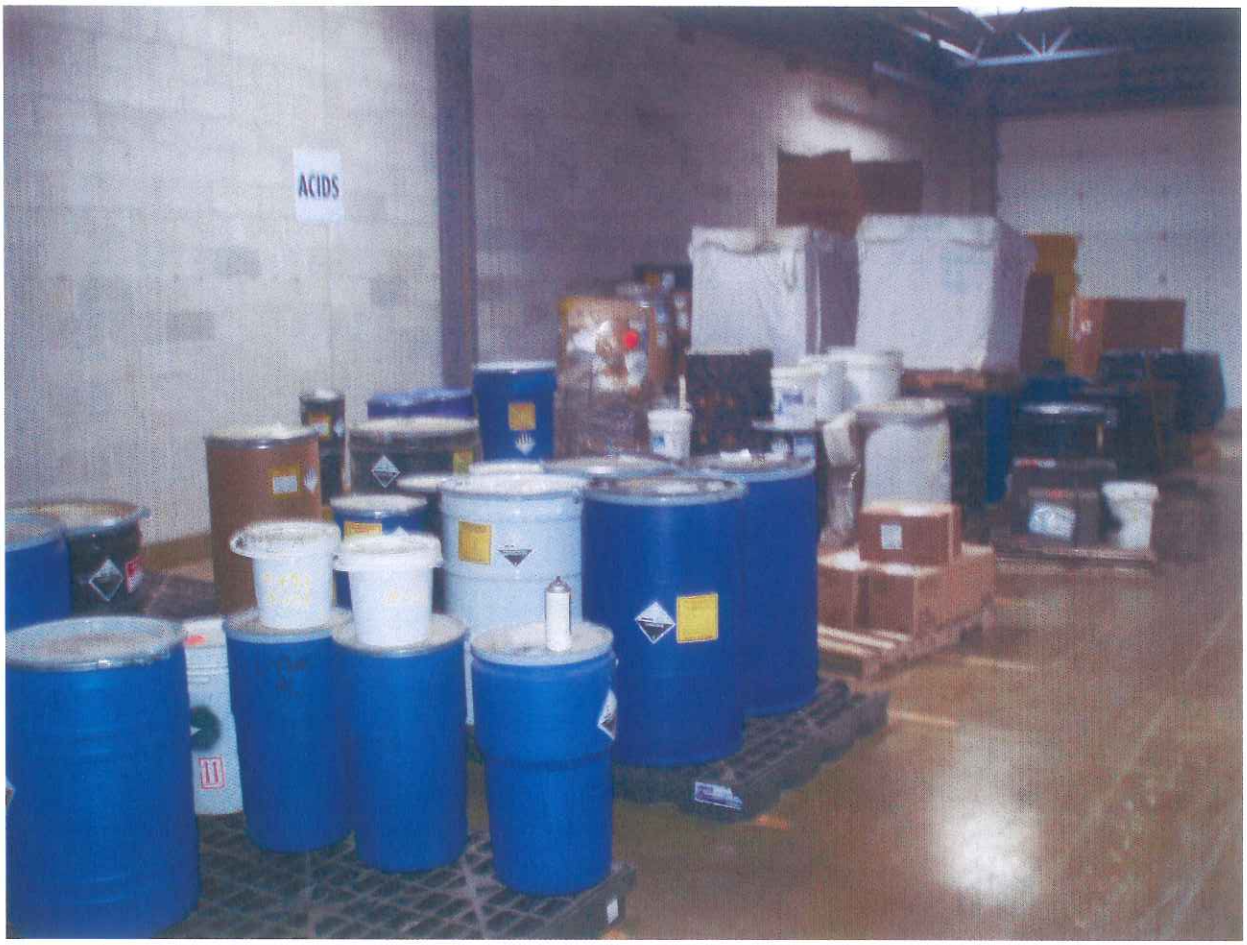
Badger Disposal of WI, Inc., Milwaukee, WI
Bryan Gangwisch, U.S. EPA 6/15/10

3. Another view, at the North Drum Warehouse, of thirty-six 55-gallon hazardous waste drums, which were received on June 11, 2010, but had not yet been processed/sampled. Since these 36 drums had not been processed, they had not been marked with an accumulation start date.

Badger Disposal of WI, Inc., Milwaukee, WI
Bryan Gangwisch, U.S. EPA 6/15/10

4. A view, at the 2007 South Addition to the North Drum Warehouse, of the storage configuration.

Badger Disposal of WI, Inc., Milwaukee, WI
Bryan Gangwisch, U.S. EPA 6/15/10

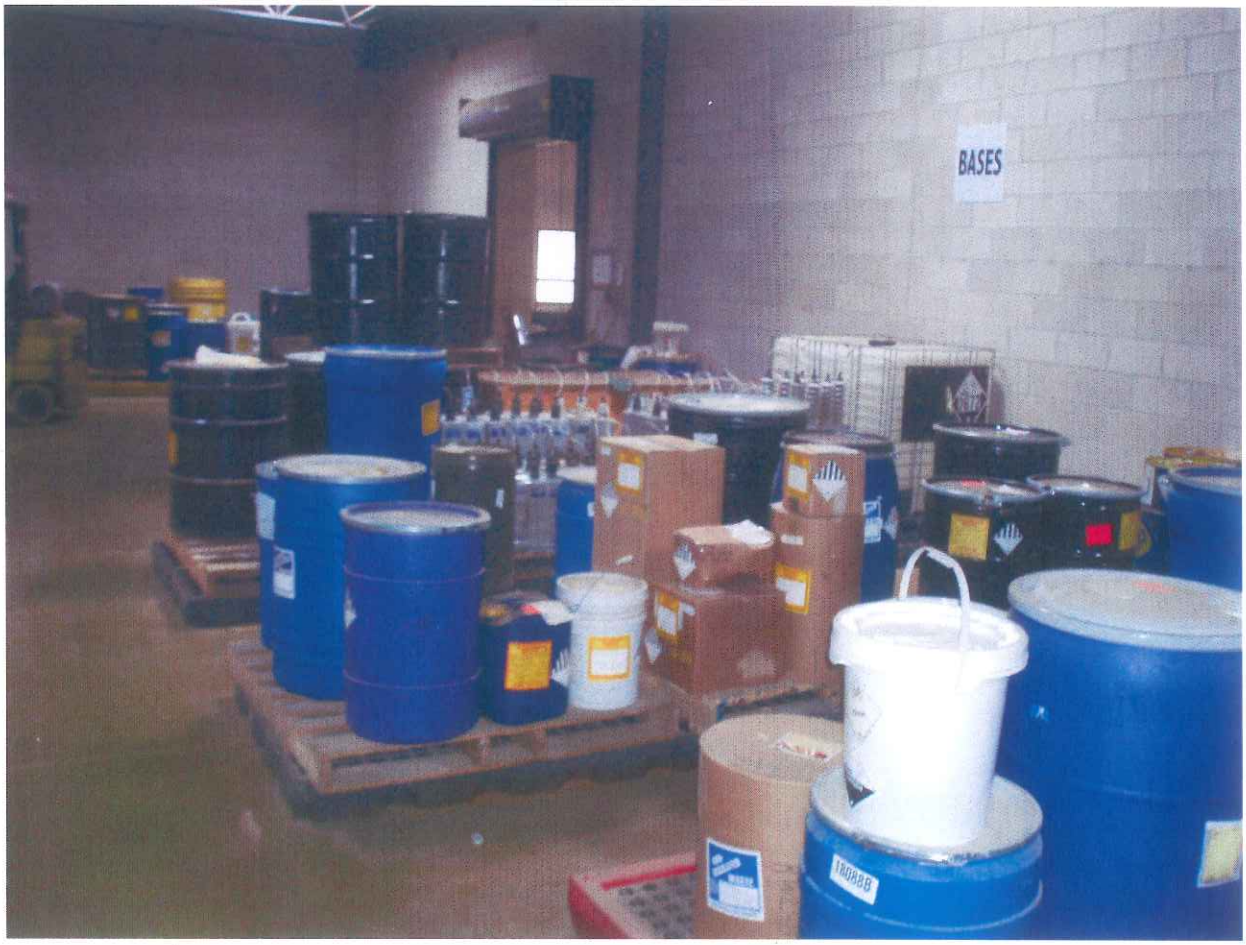


5. Another view, at the 2007 South Addition to the North Drum Warehouse, of the storage configuration.

Badger Disposal of WI, Inc., Milwaukee, WI
Bryan Gangwisch, U.S. EPA 6/15/10

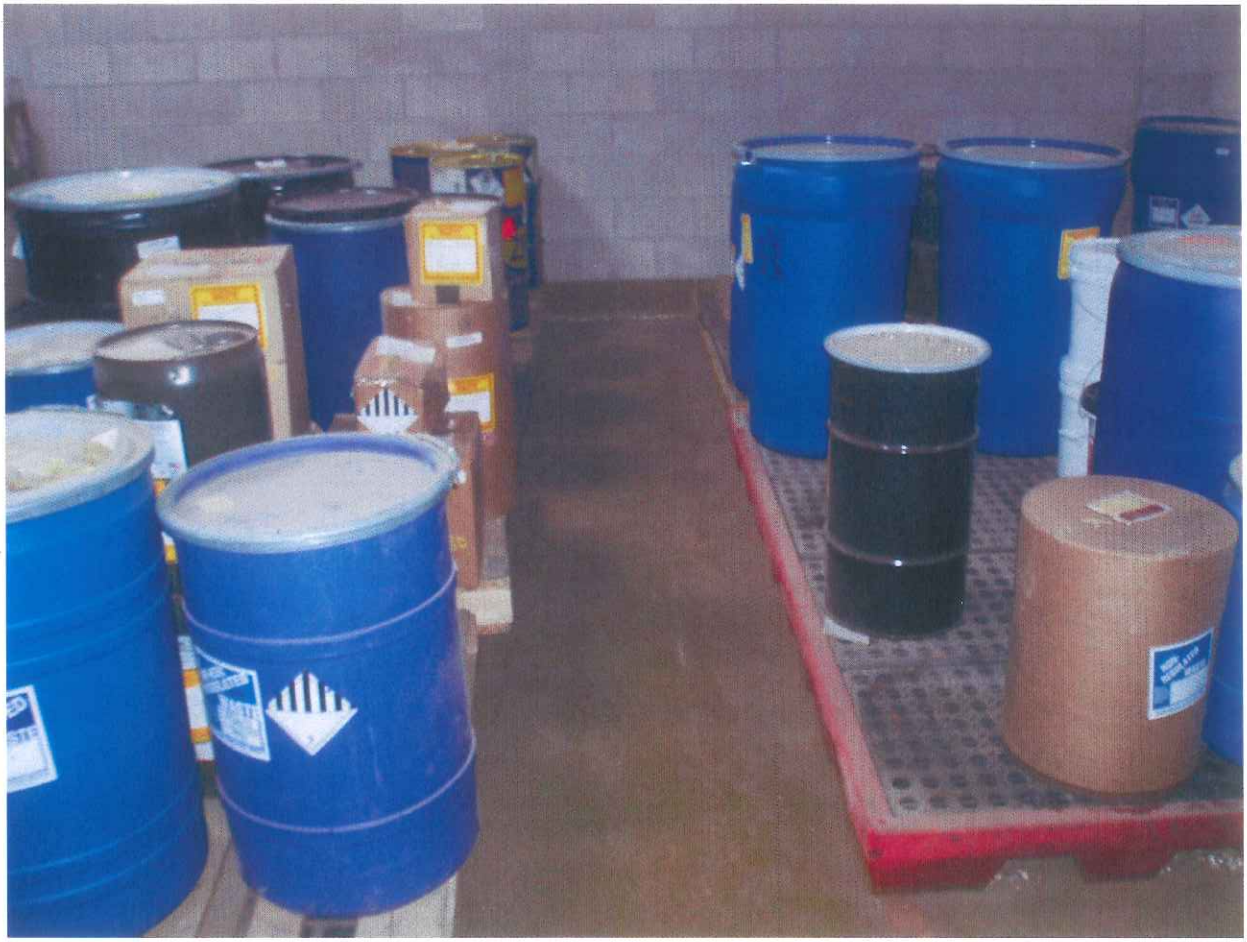
6. A view, at the 2007 South Addition to the North Drum Warehouse, of a separation berm area and the storage configuration.

Badger Disposal of WI, Inc., Milwaukee, WI
Bryan Gangwisch, U.S. EPA 6/15/10



7. Another view, at the 2007 South Addition to the North Drum Warehouse, of the storage configuration.

Badger Disposal of WI, Inc., Milwaukee, WI
Bryan Gangwisch, U.S. EPA 6/15/10



8. Another view, at the 2007 South Addition to the North Drum Warehouse, of the storage configuration.

Badger Disposal of WI, Inc., Milwaukee, WI
Bryan Gangwisch, U.S. EPA 6/15/10

9. A view, at the North Drum Warehouse, of the storage configuration.

Badger Disposal of WI, Inc., Milwaukee, WI
Bryan Gangwisch, U.S. EPA 6/15/10

10. Another view, at the North Drum Warehouse, of the storage configuration.

Badger Disposal of WI, Inc., Milwaukee, WI
Bryan Gangwisch, U.S. EPA 6/15/10

11. Another view, at the North Drum Warehouse, of the storage configuration.

Badger Disposal of WI, Inc., Milwaukee, WI
Bryan Gangwisch, U.S. EPA 6/15/10

State of Wisconsin
Department of Natural Resources
Hazardous Waste Management Program

Treatment and Storage Facility Inspection Report
04/09 Page 1 of 13

Section A: Inspection Information

Inspection Date(s)	DNR Region	DNR Inspector(s)	Inspection was
6/15/10	SE	John Schwabe	☒ Unannounced ☐ Announced

Section B: Facility Information

Facility Name	EPA ID Number	Facility ID (FID) Number
Badger Disposal of WI, Inc.	WID988580056	FID 241384000

Street Address	City	ZIP Code	County
5611 West Hemlock St.	Milwaukee	53223	Milwaukee

Facility Contact Name	Title	Telephone Number (include area code)
Randylee Schmit	Compliance Officer	(414) 760-9175

E-Mail Address: randy@badgerdisposal.com

Legal Owner Name	Telephone Number (include area code)
Badger Disposal of WI, Inc.	same

Street Address	City	State	ZIP Code
same	"	"	"

Personnel Present	Title
Randylee Schmit	Compliance Officer
Ron Mitchell	General Manager
Henry J. Kriep	President
John Schwabe	WDNR
Bryan Gangwisch	U.S. EPA

Facility Main Product or Process: Bulking & transfer of hazardous waste & non-hazardous waste for recycling, fuel blending & other waste management methods (blends fuel in tanker trucks).

Section C: Waste Received from Off-Site

Note: All "NR" references are to the Wisconsin Administrative Code. When entering information into the Field Investigator Site Tracking (FIST) database, only enter the **bold** citation into the Code or Statute Citation field

NR 664.0071(1)(b)	1. Does the facility complete the procedures by performing the following? ☒ Sign and date each copy of the manifest. ☒ Note any manifest discrepancies, if applicable. ☒ Provide at least one copy of the signed manifest to the transporter. ☒ Send a copy of the signed manifest to the generator within 30 days. ☒ Send a copy of the signed manifest to the Department within 30 days. ☒ Retain a copy of the signed manifest on-site for at least 3 years from the date of delivery.	☒ Yes ☐ No
NR 664.0072(3)	2. Does the facility follow proper procedures when a significant manifest discrepancy is noted? ☐ Attempt to reconcile discrepancy with the generator or transporter. ☐ If there is no resolution within 15 days of receiving the waste, immediately submit a letter to the department describing the situation and a copy of the manifest.	☐ Yes ☐ No ☒ N/A

Section D: Rejected Shipments of Waste

	1. Has the facility rejected shipments of hazardous waste? If No, go to Section E.	☐ Yes ☒ No
NR 664.0072(4)	2. If the waste shipment is rejected or container residues exceed the quantity limits for empty containers, does the facility comply with the following? ☐ Consult with the generator before forwarding the waste to another facility. ☐ Return the rejected waste or residue to the generator if it is impossible to forward the waste to an alternate facility. ☐ Send the waste to an alternate facility or the generator within 60 days of rejection or identifying the excess container residue. ☐ Ensure the delivering transporter retains custody of the waste. ☐ Provide secure, temporary custody of the waste before delivery to the first transporter.	☐ Yes ☐ No

NR 664.0072(5)(g)	3. Does the facility comply with the following if they reject a full load to an alternate facility before the transporter leaves? ☐ Using the original manifest, the facility forwards the rejected shipment to an alternate facility identified in Item 18b. ☐ The facility keeps one copy of the manifest for their records and gives the other copies to the transporter. ☐ If the original manifest isn't used, complete the new manifest as required by # 4 below.	☐ Yes ☐ No ☐ N/A
NR 664.0072(5)	4. Does the facility comply with the following for other rejected wastes or residues sent to an alternate facility? ☐ Prepare a new manifest according to the appendix in 40 CFR part 262. ☐ Write the generator's EPA ID #, name and address on the manifest in Items 1 and 5. ☐ Write the alternate designated facility and EPA ID # in Item 8. ☐ Copy the manifest tracking number in Item 4 of the old manifest to the special handling block in Item 14 and indicate the shipment is a residue or rejected waste. ☐ Copy the manifest tracking number in Item 4 of the new manifest to the manifest reference number in Item 18a of the old manifest. ☐ Write the DOT description in Item 9, including container types, quantity and volume. ☐ Sign the certification in Item 15 as the offerer of the shipment.	☐ Yes ☐ No ☐ N/A
NR 664.0072(6)(g)	5. Does the facility comply with the following if they reject a full load back to the generator before the transporter leaves? ☐ Use the original manifest to return the shipment. ☐ Complete items 18a and 18b, using the generator's information as the alternate facility. ☐ Retain one copy of the manifest and give the other copies to the transporter. ☐ If the original manifest isn't used, complete the new manifest as required by # 6 below.	☐ Yes ☐ No ☐ N/A
NR 664.0072(6)	6. Does the facility comply with the following if other rejected waste or residues are sent back to the generator? ☐ Prepare a new manifest according to the appendix in 40 CFR part 262. ☐ Write the facility's EPA ID# in Item 1 and the generator's name and address in Item 5 of the new manifest. ☐ Write the name and EPA ID# of the initial generator as the designated facility in Item 8. ☐ Copy the manifest tracking number in Item 4 of the old manifest to the special handling block in Item 14 of the new manifest and indicate the shipment as a residue or rejected waste. ☐ Copy the manifest tracking number in Item 4 of the new manifest to the manifest reference line in the discrepancy block of the old manifest in Item 18a. ☐ Write the DOT description in Item 9, including container types, quantity and volume of waste. ☐ Sign the certification in Item 15 as the offerer of the shipment.	☐ Yes ☐ No ☐ N/A
NR 664.0072(7)	7. Does the facility comply with the following if they reject a waste or residue <u>after</u> the manifest has been signed, dated and returned to the transporter or generator? ☐ Amend their copy of the manifest by indicating the rejected waste or residue in the discrepancy space of the manifest ☐ Copy the manifest tracking number from Item 4 of the new manifest to the discrepancy space of the amended manifest. ☐ Re-sign and date the manifest to certify the amended information. ☐ Retain a copy of the amended manifest for at least 3 years from the date of the amendment. ☐ Send a copy of the amended manifest to the transporter, generator, and department within 30 days.	☐ Yes ☐ No ☐ N/A

Section E: Waste Analysis Requirements

NR 664.0013(1)(a)	1. Before treatment or storage, has the facility obtained a detailed chemical and physical analysis of all incoming wastes?	☒ Yes ☐ No
NR 664.0013(1)(a)	2. Are waste samples analyzed by laboratories certified or registered under NR 149? If Yes, provide lab names and certification numbers. Badger Disposal of WI ID# 241384000 (registered only)	☒ Yes ☐ No
NR 664.0013(1)(c)	3. Is the analysis repeated when either of the following occurs? ☒ The process generating the waste has changed. ☒ The shipment received does not match the waste designated on the manifest.	☒ Yes ☐ No
NR 664.0013(1)(d)	4. Does the facility inspect and, if necessary, analyze each incoming waste shipment to determine if it matches the waste specified on the manifest?	☒ Yes ☐ No
NR 664.0013(2)	5. Does the facility have a written waste analysis plan?	☒ Yes ☐ No
NR 664.0013(2)	6. Does the waste analysis plan contain ALL of the following? ☒ The parameters for which each waste is tested and the reason for selecting the parameters. ☒ Test methods used for each parameter. ☒ Sampling method used to obtain a representative sample. ☒ Frequency with which the initial analysis is reviewed or repeated. ☒ For off-site facilities, the waste analysis supplied by generators.	☒ Yes ☐ No
NR 664.0013(3)	7. If the facility accepts waste from off-site, does the waste analysis plan include the procedures for inspection and/or analysis to ensure the incoming waste matches the manifest?	☒ Yes ☐ No ☐ N/A

Section F: Waste Generated On-Site and Waste Shipments

Description of Waste Generated	Hazardous Waste Code	Generation Rate lbs/month	Receiving Facility	Analysis (Date)	Generator Knowledge (✓)
solid hazardous waste residue from fuel pumping	F001, F002 F003, F005	Approx. 7,000 lbs/month	Safety-Kleen-Dolton		☑
" " " PPE	" "	Approx. 500 lbs/month	" "		☑
					☐
					☐

NR 662.011	1. Has a hazardous waste determination been made on each solid waste generated?	☒ Yes ☐ No
NR 662.011(3)(a)	2. Were waste samples analyzed by laboratories certified or registered under NR 149? If YES, provide lab names and certification numbers. see above	☒ Yes ☐ No
NR 662.011(3)	3. Has the waste determination been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used?	☒ Yes ☐ No
NR 662.040(3)	4. Are records of all waste determinations kept on-site for at least 3 years from the date the waste was last sent to a storage, treatment or disposal facility?	☒ Yes ☐ No
NR 662.020(1)	5. Is a manifest initiated with all off-site shipments of hazardous waste?	☒ Yes ☐ No
NR 662.020	6. Does the generator comply with the following manifest requirements? ☒ The manifest is used according to the instructions in the appendix to 40 CFR part 262. ☒ A facility that is permitted or licensed to accept the waste is designated on the manifest.	☒ Yes ☐ No
NR 662.023(3)	7. If waste is shipped out-of-state, does the generator send a copy of the manifest to the department within 30 days of receiving the signed copy from the designated facility?	☒ Yes ☐ No ☐ N/A
NR 662.020(1)	8. If the manifest continuation form, EPA form 8700-22A is used, is it prepared according to the instructions in the appendix of 40 CFR part 262?	☒ Yes ☐ No ☐ N/A
NR 662.040(1)	9. Is a copy of the manifest signed by the facility retained until the signed copy from the designated facility is received?	☒ Yes ☐ No
NR 662.040(1)	10. Is a copy of each manifest kept for at least three years from the date of shipment?	☒ Yes ☐ No ☐ N/A

NR 662.042	11. Are procedures for exception reporting followed? ☐ Contact the transporter or TSD if the signed manifest is not received in 35 days. ☐ Submit an exception report to the department within 45 days.	☐ Yes ☐ No ☒ N/A
NR 662.030	12. Is the hazardous waste packaged according to applicable DOT requirements before transport?	☒ Yes ☐ No
NR 662.031	13. Is the hazardous waste labeled according to applicable DOT requirements before transport?	☒ Yes ☐ No
NR 662.032(1)	14. Is the hazardous waste marked according to applicable DOT requirements before transport?	☒ Yes ☐ No
NR 662.032(2)	15. Are containers of 119 gallons and less marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport?	☒ Yes ☐ No
NR 662.033	16. Are placards offered to the initial transporter?	☒ Yes ☐ No
Section G: Land Disposal Restrictions		
NR 668.07(1)	1. Has the facility determined if each waste is prohibited from land disposal? If yes, the determination was made by using: ☒ Lab Analysis ☒ Generator knowledge	☒ Yes ☐ No
NR 668.03	2. Does the facility comply with the prohibition against dilution of wastes?	☒ Yes ☐ No
NR 668.07(1)	3. Is a one-time written notice sent to each treatment, storage or disposal facility with the initial waste shipment?	☒ Yes ☐ No
NR 668.07(1)	4. Is a new notification sent to the TSD and maintained in the generator file when the waste or receiving facility changes?	☒ Yes ☐ No ☐ N/A
NR 668.07(1)	5. Does the facility use the correct LDR notification/certification? ☐ Waste MEETS treatment standards; certification that wastes may be land disposed without further treatment ☒ Waste EXCEEDS treatment standards; notice of appropriate treatment and applicable prohibitions	☒ Yes ☐ No
NR 668.09(1)	6. Have underlying hazardous constituents been identified for characteristic wastes, if appropriate?	☒ Yes ☐ No ☐ N/A
NR 668.09(2)	7. If the waste is both a listed and characteristic waste, do the treatment standards for the listed waste code operate in lieu of the treatment standard for the characteristic waste code?	☐ Yes ☒ No ☐ N/A
NR 668.09(2)	8. If No to 7, are the treatment standards for all applicable listed and characteristic waste codes identified?	☒ Yes ☐ No ☐ N/A
NR 668.50(1)(b)	9. Is each container clearly marked to identify its contents?	☒ Yes ☐ No
NR 668.50(1)(b)	10. Is each container marked with the date on which each period of accumulation began? 36 drums	☐ Yes ☒ No
NR 668.50(2)	11. Have all wastes been in storage for one year or less?	☒ Yes ☐ No
NR 668.50(3)	12. If No to 11, has the facility documented that longer storage was necessary to facilitate proper recovery, treatment, or disposal?	☐ Yes ☐ No ☒ N/A
Section H: Recordkeeping and Reporting		
NR 664.0073(1)	1. Is an operating record maintained at the facility?	☒ Yes ☐ No

NR 664.0073(2)	2. Does the operating record contain ALL of the following information, as applicable? ☒ Description and quantity of each waste received. ☒ Method and date of each wastes treatment, storage or disposal. ☒ Location and quantity of each hazardous waste within the facility. ☒ Records and results of the waste analysis performed. ☒ Summary reports and details of all incidents that required implementation of the contingency plan. ☒ Closure cost estimates and any changes that are made in these estimates. ☒ Other monitoring, analytical data and tested as required. ☒ For off-site storage and treatment facilities, a copy of the LDR notice required by the generator or the owner/operator. ☒ For on-site storage and treatment facilities, the information contained in the LDR notice, except the manifest number, required by the generator or owner/operator.	☒ Yes ☐ No
NR 664.0073(2)	3. Are documents in the operating record maintained until closure of the facility?	☒ Yes ☐ No
NR 664.0075	4. Have annual reports covering facility activities during the previous calendar year been submitted to the Department by March 1 of the following year?	☒ Yes ☐ No
NR 664.0076	5. Has the facility submitted an unmanifested waste report within 15 days if the facility received a waste from an off-site source without an accompanying manifest or shipping paper AND the waste is not excluded from manifest requirements?	☐ Yes ☐ No ☒ N/A
NR 664.0074(1)	6. Are annual reports and unmanifested waste reports available for inspection?	☒ Yes ☐ No
Section I: Preparedness and Prevention		
NR 664.0032	1. Is the facility equipped with ALL of the following, unless the equipment is not necessary for the types of wastes handled? ☒ Device to summon emergency assistance (e.g., telephone, 2 way radio). ☒ Internal communications and alarm systems. ☒ Portable fire extinguishers. ☒ Fire control equipment, including special extinguishing equipment. ☒ Spill control equipment. ☒ Decontamination equipment (e.g., eyewash, shower). ☒ Water at adequate volume and pressure to supply water spray systems.	☒ Yes ☐ No
NR 664.0033	2. Is all of the above emergency equipment tested and maintained to assure its proper operation in an emergency?	☒ Yes ☐ No
NR 664.0034	3. Is there immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas?	☒ Yes ☐ No
NR 664.0037	4. Has the facility made necessary arrangements with ALL of the following emergency organizations? ☒ Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. ☒ Familiarize police, fire and emergency response teams with the facility layout, hazards of the waste handled, places where personnel work, entrances and roads in the facility and possible evacuation routes. ☒ Agreements with emergency response contractors and equipment suppliers. ☒ Familiarize local hospitals with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	☒ Yes ☐ No
NR 664.0035	5. Is aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment?	☒ Yes ☐ No
Section J: Contingency Plan		
NR 664.0051	1. Does the facility have a written contingency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge?	☒ Yes ☐ No
NR 664.0052(2)	2. Has the facility amended a SPCC plan or other emergency plan so it incorporates hazardous waste management provisions sufficient to comply with these requirements?	☐ Yes ☐ No ☒ N/A

NR 664.0053(2)	3. Have copies of the contingency plan and all revisions been made available to ALL of the following? ☒ Police ☒ Fire ☒ Hospital ☒ Emergency response teams	☒ Yes ☐ No
NR 664.0054	4. Does the contingency plan need to be amended due to any of the following? ☐ Facility license was revised. ☐ Contingency plan failed in an emergency. ☐ Change in site design, construction, O&M, or other circumstances which affect emergency response. ☐ Emergency coordinators changed. ☐ Emergency equipment changed.	☐ Yes ☒ No
NR 664.0055	5. Does the plan identify an emergency coordinator who meets ALL of the following? ☒ Available or on call to coordinate emergency response measures. ☒ Familiar with all aspects of site activities and the contingency plan. ☒ Has authority to commit the resources needed to carry out the contingency plan.	☒ Yes ☐ No
NR 664.0052	6. Does the contingency plan include ALL of the following? ☒ Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. ☒ Name, address and phone number, office and home, for each emergency coordinator. ☒ Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. ☒ Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. ☒ Actions facility personnel will take in response to a fire, explosion or hazardous waste discharge. ☒ List of emergency equipment at the facility including location, description, and capabilities of each item.	☒ Yes ☐ No
NR 664.0056	7. Does the plan require the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes? ☒ Activate internal alarms or communication systems. ☒ Notify appropriate authorities, if their help is needed. ☒ Identify the character, source, amount, and extent of discharged hazardous materials. ☒ Assess hazards to human health and the environment. ☒ If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). ☒ Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. ☒ Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the facility stops operation. ☒ Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. ☒ Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. ☒ Ensure that emergency equipment is clean and fit for use prior to resuming operations. ☒ Notify the department and appropriate state and local authorities before resuming operations. ☒ Submit an incident report to the department within 15 days.	☒ Yes ☐ No

Section K: Security and General Inspection Requirements		
NR 664.0014(2)	1. Does the facility have EITHER of the following to prevent the unknowing entry and minimize the unauthorized entry of persons or livestock onto active portions of the site? ☒ 24-hour surveillance system (guards, facility personnel, or television) ☐ Artificial or natural barriers to control entry (fence around active portions of facility) and a means to control entry (attendants, locked entrances or controlled roadway access)	☒ Yes ☐ No
NR 664.0014(3)	2. Are "Danger – Unauthorized Personnel Keep Out" signs posted at entrances and other locations?	☒ Yes ☐ No
NR 664.0015(1)	3. Does the facility conduct inspections to determine if problems exist which could cause an environmental or human health hazard?	☒ Yes ☐ No
NR 664.0015(1)	4. Are the inspections conducted frequently enough to identify and correct problems before they harm human health or the environment?	☒ Yes ☐ No
NR 664.0015(2)(a)	5. Has a written inspection schedule been developed for the following equipment? ☒ Monitoring equipment ☒ Safety and emergency equipment ☒ Security devices ☒ Operating and structural equipment	☒ Yes ☐ No
NR 664.0015(2)(c)	6. Does the schedule identify problems to look for during inspections?	☒ Yes ☐ No
NR 664.0015(3)	7. Are problems remedied on a schedule that ensures they do not lead to environmental or human health hazards?	☒ Yes ☐ No
NR 664.0015(4)	8. Is a written inspection log maintained at the facility for at least 3 years?	☒ Yes ☐ No
NR 664.0015(4)	9. Do the inspection logs include ALL of the following? ☒ Date and time of inspection. ☒ Name of inspector. ☒ Notation of the observations made. ☒ Date and nature of repairs or remedial actions.	☒ Yes ☐ No
Section L: Personnel Training Requirements		
NR 664.0016(1)(a)	1. Does the facility have a program of classroom instruction or on-the-job training for personnel in hazardous waste management?	☒ Yes ☐ No
NR 664.0016(1)(b)	2. Is the program directed by a person trained in hazardous waste management procedures?	☒ Yes ☐ No
NR 664.0016(1)(b)	3. Does the program teach facility personnel hazardous waste management procedures relevant to the positions in which they are employed?	☒ Yes ☐ No
NR 664.0016(1)(c)	4. Does the training program ensure personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items? ☒ Contingency plan implementation. ☒ Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. N/A ☐ Key parameters for automatic waste feed cut-off systems. ☒ Communications and alarm systems. ☒ Response to fires or explosions. ☒ Response to groundwater contamination incidents. ☒ Shutdown of operations.	☒ Yes ☐ No
NR 664.0016(2)	5. Are new employees trained within 6 months of their assignment?	☒ Yes ☐ No
NR 664.0016(2)	6. Do employees work in supervised positions until they complete the training?	☒ Yes ☐ No
NR 664.0016(3)	7. Do personnel take part in an annual review of the training?	☒ Yes ☐ No
664.0016(4)	8. Does the facility keep ALL of the following training documents? ☐ Job title and the employee name for each position related to hazardous waste management. ☐ Job description of each of the above job titles. ☒ Description of the amount and type of introductory and continuing training that will be given to each employee. ☐ Records that required training has been given to each employee.	☐ Yes ☒ No

NR 664.0016(5)	9. Are training records maintained? ☒ Until closure for current personnel. ☒ At least 3 years from the date the employee last worked at the facility.	☒ Yes ☐ No
Section M: Ignitable, Reactive or Incompatible Waste		
	1. Does the facility treat or store ignitable, reactive or incompatible waste? If No, go to Section N.	☒ Yes ☐ No
NR 664.0017(1)	2. Does the facility take precautions to prevent accidental ignition or reaction in the following ways? ☒ Separate and protect waste from sources of ignition or reaction. ☒ Confine smoking and open flame to specially designated locations. ☒ Conspicuously place "No Smoking" signs where there is a hazard from ignitable or reactive wastes.	☒ Yes ☐ No
NR 664.0017(2)	3. Does the facility treat, store, or mix ignitable, reactive, or incompatible waste so that the waste does not result in any of the following? ☒ Generate extreme heat or pressure, fire, or explosion, or violent reaction. ☒ Produce uncontrolled toxic mists, fumes, dust or gases in sufficient quantities to threaten human health. ☒ Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a fire or explosion risk. ☒ Damage the structural integrity of the device or facility containing the waste. ☒ Otherwise threaten human health or the environment.	☒ Yes ☐ No
NR 664.0176	4. Are containers of ignitable or reactive waste located at least 50 feet from the property line?	☒ Yes ☐ No
NR 664.0177(1)	5. Are incompatible wastes stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers?	☒ Yes ☐ No
NR 664.0177(2)	6. Are containers that previously held waste washed before adding incompatible waste?	☐ Yes ☐ No ☒ N/A
NR 664.0177(3)	7. Are containers of incompatible wastes separated or protected from each other by a physical barrier (dike, berm, wall or other device)?	☒ Yes ☐ No
Section N: Container Standards		
	1. Does the facility store hazardous waste in containers? If No, go to Section O.	☒ Yes ☐ No
NR 664.0171	2. If a container is leaking or in poor condition, are the contents transferred to another container in good condition?	☒ Yes ☐ No
NR 664.0172	3. Are containers made or lined with materials that are compatible with the waste?	☒ Yes ☐ No
NR 664.0173(1)	4. Are containers kept closed, except when it is necessary to add or remove waste?	☒ Yes ☐ No
NR 664.0173(2)	5. Are containers opened, handled or stored to prevent ruptures or leaks?	☒ Yes ☐ No
NR 664.0174	6. Are container storage areas inspected weekly for leaks and deterioration?	☒ Yes ☐ No
NR 664.0015(4)	7. Are inspections of the container storage areas documented in an inspection log?	☒ Yes ☐ No
NR 664.0175(2)(a)	8. Is the base of the containment system free of cracks and sufficiently impervious to contain leaks?	☒ Yes ☐ No
NR 664.0175(2)(e)	9. Are waste and accumulated precipitation removed from the sump or collection area in a timely manner to prevent overflow of the collection system?	☒ Yes ☐ No
Section O: Subch. AA Requirements for Process Vents		
N/A	1. Does the facility conduct distillation, fractionation, thin-film evaporation, solvent extraction, air stripping operations or steam stripping operations in units managing hazardous waste? If NO, go to Section P.	☐ Yes ☐ No

NR 664.1034(4)	2. Has the facility determined that the process vents are not subject to subch. AA by making an initial determination that the time-weighted, annual average total organic concentration of the waste managed in the above units is <10 ppmw by either of the following? ☐ Direct measurement of the organic concentration of the waste. ___Calculated as an arithmetic mean from 4 grab samples. ☐ Knowledge of the waste by any of the following: ___ Documentation shows no organic compounds are used in the process. ___ Documentation shows that another identical process generates waste with < 10 ppmw total organic content. ___ If based on prior analysis, documentation shows there has been no change to the process that would affect total organic concentration. ___ Other similar documentation.	☐ Yes ☐ No
NR 664.1034(5)	3. If the facility determined that the average total organic concentration is <10 ppmw, has the determination been made according to all of the following? ☐ When the waste was first managed in the waste management unit or when the facility became subject to subch. AA. ☐ Annually thereafter for continuously generated waste. ☐ When there was a change in the waste managed or a change in the process generating or treating the waste.	☐ Yes ☐ No ☐ N/A
NR 664.1035(6)	4. Does the operating record include the information used to determine that the time weighted, annual average total organic concentration managed in the waste management unit is <10 ppmw?	☐ Yes ☐ No ☐ N/A
NR 664.1030(5)	5. Has the facility determined they are not subject to subch. AA because they have certified that all process vents are equipped with air emission controls operating according to the process vent requirements in the Clean Air Act?	☐ Yes ☐ No
	6. Are all process vents excluded from subch. AA requirements because the average total organic concentration is <10ppmw or because the vents are equipped with air emission controls? If YES, go to Section P.	☐ Yes ☐ No
NR 664.1032(1)	7. Have the total organic emissions from all process vents subject to subch. AA been reduced to either of the following? ☐ Below 3 lb/hr and 3.1 tons/yr. ☐ By 95 weight percent using a control device.	☐ Yes ☐ No
NR 664.1032(3)	8. Are vent emissions and emission reductions or total organic compound concentrations achieved by add-on control devices based on either of the following? ☐ Engineering calculations. ☐ Performance tests.	☐ Yes ☐ No
NR 664.1035(6)	9. Are all of the following records included in the facility operating record when knowledge of the waste or process is used to determine if the process vent is subject to subch. AA standards? ☐ Vent emissions and emission reduction rates. ☐ The total organic compound concentrations achieved by add-on control devices, based on engineering calculations or performance tests.	☐ Yes ☐ No
	10. If the facility uses a closed-vent system and control device to reduce total organic emissions, has the Standards for Closed Vent Systems and Control Devices for subch. AA and BB inspection form been completed?	☐ Yes ☐ No ☐ N/A

Section P: Subch. BB Requirements for Equipment Leaks

N/A

	1. Does the facility operate any of the following equipment that contains or contacts hazardous wastes with organic concentrations ≥ 10% by weight? If NO, go to Section Q. ☐ Pumps in light liquid service. ☐ Compressors. ☐ Pressure relief devices in gas or vapor service. ☐ Sampling connection systems. ☐ Open-ended valves or lines. ☐ Valves in gas or vapor service or in light liquid service. ☐ Pumps or valves in heavy liquid service ☐ Pressure relief devices in light liquid or heavy liquid service. ☐ Flanges or other connectors.	☐ Yes ☐ No
NR 664.1050(5) NR 664.1064(7)(e)	2. Is the equipment listed in question 1 excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number?	☐ Yes ☐ No
NR 664.1050(6)	3. Is the equipment listed in question 1 excluded from subch. BB requirements because both of the following are met? ☐ Operates < 300 hours per calendar year. ☐ Identified, either by list or location (area or group), in the facility operating record.	☐ Yes ☐ No
NR 664.1064(13)	4. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, is the documentation readily available as part of the operating record?	☐ Yes ☐ No ☐ N/A
NR 664.1064(11)	5. Is the following information used to determine the applicability of the exclusions in questions 2-4 recorded in the operating log? ☐ Analysis determining the design capacity of the hazardous waste management unit. ☐ Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. ☐ Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB. ☐ When knowledge of the nature of the hazardous waste stream or the process by which it was produced is applied, supporting documentation such as the following: ___ Information that the production process does not use organic compounds. ___ The process is identical to a process at another facility where the total organic content was measured at <10% ___ The process has not changed to affect the total organic concentration of the waste. ☐ A new determination is performed if there are any changes that could result in an increase in the total organic content of the waste in contact with equipment determined not to be subject to subch. BB requirements.	☐ Yes ☐ No
	6. Is all of the equipment listed in question 1 excluded from additional subch. BB requirements? If NO, complete the subch. BB inspection form.	☐ Yes ☐ No
Section Q: Subch. CC Level 1 Standards for Containers		
NR 664.1086(2)(a)	1. Does the facility manage hazardous waste in either of the following subch. CC level 1 containers? If NO, go to Question 21. ☒ Containers with a design capacity between 26 gallons and 119 gallons. ☐ Containers with a design capacity of >119 gallons that are not in light material service.	☒ Yes ☐ No

Also see U.S. EPA Subpart CC checklist

NR 664.1082(3)(a) NR 664.1083(1)	2. Are containers exempt from subch. CC because of all of the following? ☐ The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. ☐ The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. ☐ The initial determination is reviewed and updated at least once every 12 months. ☐ A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to ≥500 ppmw. ☐ The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	☐ Yes ☒ No
NR 664.1089(6)(a)	3. For each waste determination, are the date, time, and location of each waste sample collected maintained in the facility records?	☐ Yes ☐ No ☒ N/A
NR 664.1082(3)	4. Is a container exempt from subch. CC because of any of the following? ☐ The organic content of all waste entering the container has been reduced by an organic destruction or removal process described in NR 664.1082(3) or NR 665.1083(3). ☐ The hazardous organic constituents of the waste placed in the container have been treated to meet LDR standards.	☐ Yes ☒ No
NR 664.1080(4)	5. Are containers excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes? Note: Certain records must be maintained. Refer to NR 664.1089(9) or 665.1090(9) for more information.	☐ Yes ☒ No
NR 664.1080(2)	6. Does the facility manage the following containers that are excluded from subch. CC? ☐ Containers are used solely to store or treat: ___ On-site remediation wastes generated through NR 700 or RCRA corrective action activities. ___ Radioactive mixed wastes in accordance with NRC requirements. ☐ Containers are equipped with air emission controls operated in accordance with the Clean Air Act requirements.	☐ Yes ☒ No
NR 664.1089(10)	7. If the air emission control device for subch. CC containers is operated in accordance with the Clean Air Act requirements, are the following records maintained? ___ A certification of such by the owner or operator. ___ The specific air program compliance requirements for the containers.	☐ Yes ☐ No ☒ N/A
	8. Are all containers managed at the facility excluded from subch. CC level 1 requirements? If YES, go to Question 21.	☐ Yes ☒ No
NR 664.1086(3)(a)	9. Are the following controls used on all Level 1 containers subject to subch. CC? ☒ Container meets applicable US DOT packaging requirements. ☒ A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. ☒ An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	☒ Yes ☐ No
664.1086(3)(b)	10. Are Level 1 containers that do not meet applicable US DOT packaging requirements equipped with covers and closure devices composed of suitable materials that do both of the following? ☐ Minimize exposure of hazardous waste to the atmosphere. ☐ Maintain integrity of the covers and closure devices.	☐ Yes ☐ No N/A

NR 664.1086(3)(c)	11. If a Level 1 container is filled to the final level in one continuous operation, is the closure device promptly secured in the closed position when the filling operation is concluded?	☒ Yes ☐ No ☐ N/A
NR 664.1086(3)(c)	12. If a Level 1 container is batch filled, is the closure device promptly secured in a closed position when any of the following occurs? ☐ The container is filled to the intended final level. ☐ The batch loading is completed and any of the following first occurs: ___ No additional material will be added within 15 minutes. ___ The person performing the loading operation leaves the immediate vicinity of the container. ___ The process generating the waste shuts down.	☐ Yes ☐ No ☒ N/A no batch filling
NR 664.1086(3)(c)	13. If Level 1 containers are opened to remove hazardous waste, is the closure device secured in the closed position upon completion of a batch removal and when either of the following first occurs? ☐ No additional materials will be removed within 15 minutes. ☐ The person removing the waste leaves the immediate vicinity of the container.	☐ Yes ☐ No ☒ N/A
NR 664.1086(3)(c)	14. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), is the closure device secured in the closed position promptly after completing the activity?	☒ Yes ☐ No ☐ N/A
NR 664.1086(3)(c)	15. If a Level 1container is equipped with a pressure relief device that vents to the atmosphere, are all of the following conditions met? ☐ The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. ☐ The device is closed when the internal pressure is within the specified operating range. ☐ The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	☐ Yes ☐ No ☒ N/A
NR 664.1086(3)(c)	16. Are safety valves only opened to avoid an unsafe condition?	☐ Yes ☐ No ☒ N/A
NR 664.1086(3)(d)	17. When first taking possession of a Level 1 container that will not be emptied within 24 hours, does the facility visually inspect the container, cover and closure device for visible cracks, holes, gaps or other open spaces on or before the date the facility accepts the container (e.g., signs the manifest)?	☒ Yes ☐ No ☐ N/A
NR 664.1086(3)(d)	18. If a Level 1 container remains at the facility for one year or more, is the container, its cover and closure devices visually inspected initially and at least once every 12 months for cracks, gaps or other open spaces?	☐ Yes ☐ No ☒ N/A
NR 664.1086(3)(d)	19. When a defect is detected, are the following repairs made? ☒ Initial repair efforts are made within 24 hours of detection and completed within 5 calendar days ☒ If repairs cannot be completed in 5 days, the waste is removed from the container which is not used until it is repaired.	☒ Yes ☐ No ☐ N/A
NR 664.0015(2)(d)	20. Are records of these inspections maintained in the operating log for at least 3 years?	☒ Yes ☐ No
NR 664.1086(2)	21. Does the facility manage hazardous waste in either of the following? If YES, complete the Subch. CC Level 2 and 3 Requirements for Containers and Tanks inspection report. ☒ Containers having a design capacity >119 gallons that are in light material service. ☐ Containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere.	☒ Yes ☐ No

NR 664.1090(1)	22. For facilities with a final operating license: If the facility managed hazardous waste with an average VO concentration >500 ppmw or without adequate reduction of the organic content by an organic destruction or removal process in a container exempt from subch. CC level 1, 2 or 3 standards, has the facility met all of the following? ☐ Submitted a written report to the department which includes all of the following information: ___ Name of the facility, EPA ID#, and address. ___ A description of the noncompliance event and the cause. ___ The dates of noncompliance. ___ The actions taken to correct the noncompliance and prevent reoccurrence. ☐ The report is submitted within 15 calendar days of the time the owner or operator becomes aware of the occurrence.	☐ Yes ☐ No ☒ N/A

Section R: Financial Responsibility

NR 664.0143	1. Does the facility have proof of financial responsibility for closure?	☒ Yes ☐ No
NR 664.0143	2. Is the facility using any of the following as the proof mechanism for closure? ☐ Closure trust fund ☐ Net worth test ☐ Surety bond ☐ Deposit with the department ☒ Letter of credit ☐ Escrow account ☐ Insurance ☐ Multiple financial mechanisms	☒ Yes ☐ No
NR 664.0143	3. Is the amount of the proof mechanism adequate to cover the most recent closure cost estimate?	☒ Yes ☐ No
NR 664.0143	4. If 3 is No, is the facility taking steps to increase the financial assurance to cover the closure costs within 60 days of a cost increase?	☐ Yes ☐ No ☒ N/A
NR 664.0147(1)	5. Does the facility have liability coverage for sudden accidental occurrences?	☒ Yes ☐ No
NR 664.0147(1)	6. Is the facility using any of the following as a method of liability coverage? ☒ Insurance ☐ Surety bond ☐ Financial test ☐ Trust fund ☐ Guarantee ☐ Multiple financial mechanisms ☐ Letter of credit	☒ Yes ☐ No
	7. Indicate the date of the most recent financial review done by the Department	Date: 12/2/09
	8. Did the Department find that the financial responsibility for closure and liability coverage was adequate during the most recent financial review?	☒ Yes ☐ No

Section S: License Requirements

NR 670.032	1. Is the facility complying with the requirements of the license? ☒ Facility is in compliance with the conditions of the license ☐ Facility has not exceeded capacity limits for storage or treatment units	☐ Yes ☒ No
NR 670.042	2. Has the facility notified the Department or requested a modification to their license, as required, for any changes at the facility?	☒ Yes ☐ No ☐ N/A

Section T: Waste Minimization

NR 664.0073(2)(i)	1. Does the facility have a program to reduce the volume and toxicity of hazardous waste generated to the greatest economical degree possible?	☒ Yes ☐ No
NR 664.0073(2)(i)	2. Is a waste minimization certification signed at least annually maintained in the facility's operating record?	☒ Yes ☐ No
NR 664.0075	3. Does the facility include waste minimization information in its annual report?	☒ Yes ☐ No ☐ N/A

Section U: Facility Status Evaluation

	1. Is the facility conducting hazardous waste activities other than container storage?	☒ Yes ☐ No
	2. If YES, check all that apply and complete additional inspection forms. ☐ Tank Storage ☐ Waste Pile/Containment Building ☐ Transfer ☐ Transporter ☐ Miscellaneous Unit ☐ Incinerator ☐ BIF ☐ Land fill/Surface Impoundment ☐ Land Treatment ☒ Used Oil ☒ Universal Waste	

JR Inspector Signature: | Date:

NR 664.1090(1)	22. For facilities with a final operating license: If the facility managed hazardous waste with an average VO concentration >500 ppmw or without adequate reduction of the organic content by an organic destruction or removal process in a container exempt from subch. CC level 1, 2 or 3 standards, has the facility met all of the following? ☐ Submitted a written report to the department which includes all of the following information: ___ Name of the facility, EPA ID#, and address. ___ A description of the noncompliance event and the cause. ___ The dates of noncompliance. ___ The actions taken to correct the noncompliance and prevent reoccurrence. ☐ The report is submitted within 15 calendar days of the time the owner or operator becomes aware of the occurrence.	☐ Yes ☐ No ☒ N/A

Section R: Financial Responsibility

NR 664.0143	1. Does the facility have proof of financial responsibility for closure?	☒ Yes ☐ No
NR 664.0143	2. Is the facility using any of the following as the proof mechanism for closure? ☐ Closure trust fund ☐ Net worth test ☐ Surety bond ☐ Deposit with the department ☒ Letter of credit ☐ Escrow account ☐ Insurance ☐ Multiple financial mechanisms	☒ Yes ☐ No
NR 664.0143	3. Is the amount of the proof mechanism adequate to cover the most recent closure cost estimate?	☒ Yes ☐ No
NR 664.0143	4. If 3 is No, is the facility taking steps to increase the financial assurance to cover the closure costs within 60 days of a cost increase?	☐ Yes ☐ No ☒ N/A
NR 664.0147(1)	5. Does the facility have liability coverage for sudden accidental occurrences?	☒ Yes ☐ No
NR 664.0147(1)	6. Is the facility using any of the following as a method of liability coverage? ☒ Insurance ☐ Surety bond ☐ Financial test ☐ Trust fund ☐ Guarantee ☐ Multiple financial mechanisms ☐ Letter of credit	☒ Yes ☐ No
	7. Indicate the date of the most recent financial review done by the Department	Date: 12/2/09
	8. Did the Department find that the financial responsibility for closure and liability coverage was adequate during the most recent financial review?	☒ Yes ☐ No

Section S: License Requirements

NR 670.032	1. Is the facility complying with the requirements of the license? ☒ Facility is in compliance with the conditions of the license ☐ Facility has not exceeded capacity limits for storage or treatment units	☐ Yes ☒ No
NR 670.042	2. Has the facility notified the Department or requested a modification to their license, as required, for any changes at the facility?	☒ Yes ☐ No ☐ N/A

Section T: Waste Minimization

NR 664.0073(2)(i)	1. Does the facility have a program to reduce the volume and toxicity of hazardous waste generated to the greatest economical degree possible?	☒ Yes ☐ No
NR 664.0073(2)(i)	2. Is a waste minimization certification signed at least annually maintained in the facility's operating record?	☒ Yes ☐ No
NR 664.0075	3. Does the facility include waste minimization information in its annual report?	☒ Yes ☐ No ☐ N/A

Section U: Facility Status Evaluation

	1. Is the facility conducting hazardous waste activities other than container storage?	☒ Yes ☐ No
	2. If YES, check all that apply and complete additional inspection forms. ☐ Tank Storage ☐ Waste Pile/Containment Building ☐ Transfer ☐ Transporter ☐ Miscellaneous Unit ☐ Incinerator ☐ BIF ☐ Land fill/Surface Impoundment ☐ Land Treatment ☒ Used Oil ☐ Universal Waste	

DNR Inspector Signature: | Date:

6/15/10 Badger Disposal of WI, Inc.

State of Wisconsin
Department of Natural Resources
Hazardous Waste Management Program

Universal Waste Handler Inspection Report
(02/08) Page 1 of 3

Note: Use this checklist for universal waste handler inspections. The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices (see Section C). A Universal Waste Handler means a generator of universal waste, or the owner or operator of a facility, including all contiguous property, that receives universal waste from other handlers, accumulates universal waste, and sends universal waste to another universal waste handler, designation facility, or to a foreign destination. **Universal waste handler does not include a person who treats, disposes or recycles universal waste, or a person engaged in the off-site transportation of universal waste [s. NR 673.09(12)(b), Wis. Adm. Code].** Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section A: Inspection Information

Inspection Date(s)	DNR Region	DNR Inspector(s)	Inspection was
6/15/10	SE	John Schwabe	☒ Unannounced ☐ Announced

Section B: Facility Information

Facility Name	EPA ID Number		Facility ID (FID) Number
Badger Disposal of WI, Inc.	WID988580056		241384000
Street Address	**City**	**ZIP Code**	**County**
5611 West Hemlock St.	Milwaukee	53223	Milwaukee
Contact Name	**Title**		**Telephone Number (include area code)**
Kandylee Schmit	Compliance Officer		(414) 760 - 9175
E-Mail Address	kandy@badgerdisposal.com		
Legal Owner Name	Badger Disposal of WI, Inc.		**Telephone Number (include area code)** Same
Street Address	**City**		**State** / **ZIP code**
Same	"		" / "
Personnel Present	Kandylee Schmit, Ron Mitchell	**Title**	Compliance Officer, General Manager
Personnel Present	Henry J. Krier, Bryan Gangwisch, John Schwabe	**Title**	President, U.S. EPA, WDNR

Section C: Universal Wastes Handled (includes Wisconsin-specific universal wastes)

	Waste Type	Generated?	Quantity Generated	Receiving Facility
NR 673.02	Batteries (rechargeable, Ni/Cd, mercury, but not lead acid batteries subject to NR 666.080)	☒ Yes ☐ No	< 11,025 lbs at any time	Mercury Waste Solutions
NR 673.03	Pesticides (suspended, cancelled or recalled)	☐ Yes ☒ No		
NR 673.04	Mercury Thermostats	☒ Yes ☐ No	< 11,025 lbs at any time	" " "
NR 673.05	Lamps (fluorescent, HID, mercury or sodium vapor)	☒ Yes ☐ No	< 11,025 lbs. at any time	" " "
8/11/06 Memo	Mercury-Containing Equipment (thermometers, switches)	☒ Yes ☐ No	< 11,025 lbs. at any time	" " "
8/11/06 Memo	Anti-Freeze (used engine coolant, propylene or ethylene glycol)	☐ Yes ☒ No		
	Total Quantity Accumulated:			

1. Facility is operating as a
   - ☒ Small Quantity Handler (Accumulates < 5,000 kg or 11,025 lb at any time).
   - ☐ Large Quantity Handler (Accumulates ≥ 5,000 kg or 11,025 lb at any time).
   - ☐ Universal Waste Destination Facility (Treat or dispose of universal waste. Subject to full regulation unless noted below).

Note: All "NR" references are to the Wisconsin Administrative Code. When entering information into the Field Investigator Site Tracking (FIST) database, only enter the **bold** citation into the Code or Statute Citation field. If more than one **bold** citation is given, enter the **bold** citation that applies.

Section D. Prohibitions

NR 673.11(1) / NR 673.31(1)	1. Is universal waste disposed on-site?	☐ Yes ☒ No

NR 673.11(2) **NR 673.31(2)**	2. Is universal waste diluted or treated on-site?	☐ Yes ☒ No
NR 673.11(2) **NR 673.31(2)**	3. If Yes to 2, does the dilution or treatment activity consist of the following exceptions? ☐ Sorting, mixing, discharging, regenerating, or disassembling batteries, removing batteries from consumer products or removing electrolytes. ☐ Removing thermostat ampules. ☐ Responding to a release of universal waste.	☐ Yes ☐ No ☒ N/A
Section E. General Standards for Small and Large Quantity Handlers		
NR 673.13 **NR 673.33**	1. Are universal wastes handled in the following ways to prevent releases, as appropriate? ☒ Universal wastes that are broken or show evidence of leakage or spillage are placed in a closed, structurally sound container that is not leaking and compatible with the waste. ☐ Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact. ☒ Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules. ☐ Thermostat ampules are removed in a manner to prevent breakage, conducted over a containment device, immediately cleaned up, and performed in a well ventilated, monitored environment. ☐ Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200. ☐ Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	☒ Yes ☐ No
NR 673.14 **NR 673.34**	2. Are all universal wastes labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste"?	☒ Yes ☐ No
NR 673.14 **NR 673.34**	3. Are the containers, tanks, or transport vehicles of recalled pesticides additionally marked with the label that was on or accompanied the product when it was sold or distributed?	☐ Yes ☐ No ☒ N/A
NR 673.15(3) **NR 673.35(3)**	4. Is the length of accumulation time demonstrated by any of the following? ☒ Mark or label each container with the earliest date the waste is generated or received. ☐ Mark or label the individual item of waste with the date it was generated or received. ☒ Maintain an inventory system identifying the date the waste was generated or received. ☐ Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. ☐ Use some other method that clearly demonstrates the length of accumulation time.	☒ Yes ☐ No
NR 673.15(1) **NR 673.35(1)**	5. Is the universal waste accumulated for less than one year from the date generated or received from another handler?	☒ Yes ☐ No
NR 673.15(2) **NR 673.35(2)**	6. If No to 5, is there proof that the waste is accumulated solely to facilitate proper recovery, treatment or disposal?	☐ Yes ☐ No ☒ N/A
NR 673.16 **NR 673.36**	7. Are employees trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility?	☒ Yes ☐ No
NR 673.17 **NR 673.37**	8. Does the handler adequately respond to releases? ☐ Immediately contain all releases. ☐ Determine if the spill residue is hazardous waste and if so, dispose of as such.	☐ Yes ☐ No ☒ N/A
Section F. Off-Site Shipments		
NR 673.18(1) **NR 673.38(1)**	1. Does the handler send the waste to a destination facility, foreign destination or another handler? Facility Name: Mercury Waste Solutions	☒ Yes ☐ No
NR 673.18(2) **NR 673.38(2)**	2. If the handler self-transports, are they complying with ALL of the following requirements? ☒ Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. ☒ Immediately contain release and make waste determination on spill residue. ☐ If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	☒ Yes ☐ No ☐ N/A

NR 673.18(3) **NR 673.38(3)**	3. If a hazardous material, does the handler package, label, mark, placard and prepare the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180?	☒ Yes ☐ No
NR 673.18(4) **NR 673.38(4)**	4. If shipping to another universal waste handler, does the handler agree to receive the shipment?	☒ Yes ☐ No
NR 673.18(5) **NR 673.18(6)** **NR 673.38(5)** **NR 673.38(6)**	5. If the shipment is rejected, does one of the following occur? ☐ The waste is sent back to the originating handler. ☐ The originating handler agrees on a destination facility to which to ship the waste.	☐ Yes ☐ No ☒ N/A
NR 673.18(7) **NR 673.38(7)**	6. If the shipment contains hazardous waste, does the handler receiving the shipment immediately notify the Department?	☐ Yes ☐ No ☒ N/A
NR 673.18(8) **NR 673.38(8)**	7. If the shipment contains nonhazardous, nonuniversal waste, is it managed in compliance with solid waste requirements?	☐ Yes ☐ No ☒ N/A

Section G. Additional Requirements for Large Quantity Handlers

NR 673.32(1)	1. Has an EPA ID# been obtained before meeting or exceeding 5,000 kg (11,025 lb)?	☐ Yes ☐ No
NR 673.39(1)	2. Is there a record for each shipment of universal waste received at the facility which contains ALL of the following information? ☐ The name and address of the originating handler or foreign shipper. ☐ The quantity of each type of universal waste received. ☐ The date the shipment was received.	☐ Yes ☐ No ☐ N/A
NR 673.39(2)	3. Is there a record for each shipment of universal waste sent off-site which contains the following information? ☐ The name and address of the facility to which the waste was sent. ☐ The quantity of each type of universal waste sent. ☐ The date the shipment of universal waste left the facility.	☐ Yes ☐ No
NR 673.39(3)	4. Are records retained for at least 3 years? ☐ From the date the shipment was received. ☐ From the date the shipment left the facility.	☐ Yes ☐ No

Section H: Inspection Comments and Signature

DNR Inspector Signature:	Date:

6/15/10 Badger Disposal of WI, Inc.

State of Wisconsin
Department of Natural Resources
Hazardous Waste Management Program

Used Oil Generator Inspection Report
05/08 Page 1 of 4

Note: Complete this inspection report when inspecting used oil generators, collection centers and aggregation points. Complete the Used Oil Inspection Form Attachment for other used oil activities.

Section A: Inspection Information

Inspection Date(s)	DNR Region	DNR Inspector(s)	Inspection was
6/15/10	SE	John Schwabe	☒ Unannounced ☐ Announced

Section B: Facility Information

Facility Name	EPA ID Number	Facility ID (FID) Number
Badger Disposal of WI, Inc.	WID988580056	FID 241384000

Street Address	City	ZIP Code	County
5611 west Hemlock St.	Milwaukee	53223	Milwaukee

Contact Name	Title
Kandylee Schmit	Compliance Officer

Telephone Number (include area code)	E-Mail Address
(414) 760-9175	kandy@badgerdisposal.com

Legal Owner Name	Telephone Number (include area code)
Badger Disposal of WI, Inc.	Same

Street Address	City	State	ZIP Code
Same	11	11	11

Personnel Present	Title
Kandylee Schmit	Compliance Officer
Ron Mitchell	General Manager
Henry J. Knier	President
John Schwabe, Bryan Gangwisch US EPA	WDNR

Note: All "NR" References are to the Wisconsin Administrative Code. When entering information into the Field Investigator Site Tracking (FIST) database, only enter the **bold** citation into the Code Citation field. If more than one **bold** citation is given, enter the **bold** citation that applies.

Section C: Proper Classification of Used Oil and the Rebuttable Presumption

NR 679.10(2)(a)1.	1. If used oil is mixed with listed hazardous waste, is the mixture managed as a listed hazardous waste?	☒ Yes ☐ No ☐ N/A
NR 679.10(2)(b)	2. If the used oil is mixed with a characteristic hazardous waste or a hazardous waste listed solely for a hazardous waste characteristic, is the mixture managed in the following way? ☒ As a hazardous waste if the mixture exhibits a hazardous waste characteristic. ☒ As a used oil if the mixture does not exhibit a hazardous waste characteristic.	☒ Yes ☐ No ☐ N/A
	3. Does the generator manage used oil containing 1,000 ppm halogens or greater? If NO, go to question # 8.	☒ Yes ☐ No
NR 679.10(2)(a)2.	4. Does the generator presume all used oil containing 1,000 ppm halogens or greater is a listed hazardous waste? If YES, go to question # 8.	☒ Yes ☐ No
NR 679.10(2)(a)2.	5. Has the generator rebutted the presumption by demonstrating any of the following? ☐ Analysis of the used oil indicates significant concentrations of halogenated hazardous constituents are not present. ☐ Metal working oils or fluids containing chlorinated paraffins are used. ☐ The oil contains CFCs from refrigeration units.	☐ Yes ☐ No ☒ N/A
NR 679.10(2)(a)2.a.	6. If the facility uses metal working oils or fluids containing chlorinated paraffins, is the used oil managed in one of the following ways? ☐ As used oil if it is reclaimed through a tolling arrangement. ☐ As a listed hazardous waste if it is recycled in some other manner or disposed of, since it contains 1,000 ppm halogens or greater.	☐ Yes ☐ No ☒ N/A

NR 679.10(2)(a)2.b.	7. If halogens are present due to chlorofluorocarbons, is the used oil managed in one of the following ways? ☐ As used oil if the CFC contaminated oil has been removed from refrigeration units and is reclaimed. ☐ As a listed hazardous waste if the CFC contaminated oil is contaminated with used oil from sources other than refrigeration units, since it contains 1,000 ppm halogens or greater.	☐ Yes ☐ No ☒ N/A
NR 679.10(3)(a)	8. If the generator properly drains or removes oil from materials such that no visible sign of free-flowing oil remains, are the drained materials managed as either of the following? ☐ A solid waste. ☐ A hazardous waste, if appropriate.	☐ Yes ☐ No ☒ N/A
NR 679.10(3)(b)	9. Are materials containing or contaminated with used oil and burned for energy recovery managed as used oil?	☐ Yes ☐ No ☒ N/A
NR 679.10(9)	10. If the used oil contains PCBs, is it managed in the following way? ☐ Used oil containing less than 50 ppm PCBs is managed as used oil. ☐ Used oil containing PCBs diluted to less than 50 ppm PCBs is managed according to NR 157 and 40 CFR 761 requirements. ☐ Used oil containing 50 ppm PCBs or more is managed according to NR 157 and 40 CFR 761 requirements.	☐ Yes ☐ No ☒ N/A
Section D: Standards for Used Oil Generators		
NR 679.22(1) **NR 679.22**	1. Is used oil only stored in the following units? ☒ Containers. ☐ Above ground storage tanks. ☐ Other units regulated under NR 664 or NR 665. ☐ Underground storage tanks in compliance with Comm 10 requirements.	☒ Yes ☐ No
NR 679.22(2)(a) **NR 679.22(2)(b)** **NR 679.22(3)(a)**	2. Do all containers and above ground tanks comply with all of the following? ☒ In good condition, having no severe rusting, apparent structural defects or deterioration. ☒ Leak tight with no visible leaks. ☒ Clearly labeled "Used Oil".	☒ Yes ☐ No ☐ N/A
NR 679.22(3)(b)	3. Are the fill pipes for underground tanks clearly labeled "Used Oil"?	☐ Yes ☐ No ☒ N/A
NR 679.22	4. Does the generator comply with applicable spill prevention, control and countermeasures (SPCC) requirements stated in 40 CFR part 112?	☒ Yes ☐ No
NR 679.22(4)(a) **NR 679.22(4)(b)** **NR 679.22(4)(c)** **NR 679.22(4)(d)**	5. If a release to the environment occurred, did the generator perform all of the following? ☐ Stop the release. ☐ Contain the released used oil. ☐ Clean up and properly manage the used oil and other materials. ☐ Repair or replace any leaking used oil storage containers or tanks before returning them to service, as necessary.	☐ Yes ☐ No ☒ N/A
NR 679. 24 **NR 679.24(3)** **NR 679.24(3)(a)** **NR 679.24(3)(b)**	6. If used oil is shipped off-site, does the generator comply with either of the following? ☒ Ensures that the transporter has an EPA ID number. ☐ If the transporter does not have an EPA ID number, the used oil is reclaimed under a tolling arrangement or contract which includes all of the following: ___ The processor or re-refiner returns the reclaimed oil to the generator for use as a lubricant, cutting oil or coolant. ___ The type of used oil and frequency of shipments are stated in the contract. ___ The vehicle used to transport the used oil to and from the generator is owned and operated by the used oil processor or re-refiner. Note: The used oil transporter should also have a solid waste transportation license.	☒ Yes ☐ No ☐ N/A

NR 679.24(1) NR 679.24(1)(a) NR 679.24(1)(b) NR 679.24(2)(a) NR 679.24(2)(b) NR 679.24(2)(c)	7. If the generator self-transports used oil without an EPA ID number and solid waste transportation license, is either of the following met? ☐ Used oil is taken to a used oil collection site and all of the following are met: ___ The used oil is only generated by the generator and household do-it-yourselfers. ___ The used oil is transported in a vehicle owned by the generator or an employee of the generator. ___ No more than 55 gallons of used oil is transported at any time. ☐ Used oil is only generated at the generator site and is taken to an aggregation point according to all of the following: ___ The used oil is transported in a vehicle owned by the generator or an employee of the generator. ___ No more than 55 gallons of used oil is transported at any time. ___ The aggregation point is owned or operated by the used oil generator.	☐ Yes ☐ No ☒ N/A
NR 679.23(1) NR 679.23(2) NR 679.23(3)	8. If the generator burns used oil in an on-site used oil-fired space heater, are all of the following conditions met? ☐ Only used oil from the generator or household do-it-yourselfers is burned. ☐ The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. ☐ The combustion gases are vented to the ambient air.	☐ Yes ☐ No ☒ N/A
NR 679.11	9. If the generator sends used oil off-site to be burned for energy recovery in a used oil-fired space heater, industrial furnace or boiler, does the used oil meet all of the following fuel specifications stated in NR 679.11 Table 1? ☐ Arsenic is 5 ppm or less. ☐ Cadmium is 2 ppm or less. ☐ Chromium is 10 ppm or less. ☐ Lead is 100 ppm or less. ☐ Flash point is a minimum of 100 °F. ☐ Total halogen is 4,000 ppm or less and hazardous waste presumption has been rebutted, if applicable.	☐ Yes ☐ No ☒ N/A used oil is blended w/ listed haz-waste as fuel
Section E: Disposal of Used Oil		
NR 679.81(1)	1. If the used oil has been determined to be a hazardous waste, is it managed according to the hazardous waste generator, transporter and TSDF requirements?	☒ Yes ☐ No ☐ N/A
NR 679.81(2)(b)	2. If material contaminated with used oil is disposed of in a solid waste landfill, have all of the following conditions been met? ☐ The materials are contaminated with only minimal amounts of used oil. ☐ The used oil has been properly drained or removed to the extent possible. ☐ Free flowing oil is not visible. ☐ The material is not a hazardous waste and cannot be recycled as used oil.	☐ Yes ☐ No ☒ N/A
NR 679.82	3. Does the facility prohibit the use of used oil as a dust suppressant?	☒ Yes ☐ No
Section F: Other Used Oil Activities		
	1. Does the facility burn off-specification used oil from generators other than the burner or do-it-yourselfers? If YES, fill out Section E, Burning Used Oil for Energy Recovery, of the Used Oil Inspection Report Attachment.	☐ Yes ☒ No
	2. Does the generator burn off-specification used oil in other than an oil-fired space heater? If YES, fill out Section E, Burning Used Oil for Energy Recovery, of the Used Oil Inspection Report Attachment.	☐ Yes ☒ No
	3. Does the generator send off-specification used oil off-site to be burned for energy recovery or first declare that the used oil meets the specifications in NR 679.11 Table 1? If YES, fill out Section F, Used Oil Fuel Marketers, of the Used Oil Inspection Report Attachment.	☐ Yes ☒ No

4. Does the generator conduct any of the following used oil transporter activities? If YES, fill out Section C, Used Oil Transporters and Transfer Facilities, of the Used Oil Inspection Report Attachment.

☐ Transports used oil that is not generated on-site or by do-it-yourselfers.
☐ Transports more than 55 gallons of used oil.
☐ Transports used oil to other than an aggregation point owned by the generator or a collection center.
☐ Stores used oil on-site as a part of the transportation activity.

☐ Yes ☐ No ☒ N/A

5. Does the generator conduct only the used oil processing or re-refining activities listed below? If NO, fill out Section D, Used Oil Processors or Re-Refiners, of the Used Oil Inspection Report Attachment.

☐ Filtering, cleaning or other reconditioning of the used oil before it is reused by the generator.
☐ Separating the used oil from wastewater before discharging the wastewater.
☐ Removing used oil from the plant air by using mist collectors.
☐ Draining or otherwise removing used oil from materials.

☐ Yes ☐ No ☒ N/A

DNR Inspector Signature:	Date:

As stated by Ms. Schmit – the used oil that Badger Disposal receives is blended w/ other hazardous waste to generate hazardous waste fuels to be burned in approved cement kilns.

State of Wisconsin
Department of Natural Resources
Hazardous Waste Management Program

Subch. CC Level 2 and 3 Requirements Containers and Tanks Inspection Report

(Includes Closed Vent Systems and Control Devices)

Bryan Gangwisch U.S. EPA

Section A: Inspection Information

Inspection Date(s)	DNR Inspector	DNR Region
6/15/10	John Schwabe	SE

Section B: Facility Information

Facility Name	EPA ID Number	Facility ID (FID) Number
Badger Disposal of WI, Inc.	WID 988580056	241384000

Street Address	City	Zip Code
5811 West Hemlock Street	Milwaukee	53223

All "NR" references are to the Wisconsin Administrative Code. When entering information into the Field Investigator Site Tracking (FIST) database, only enter the **bold** citation into the Code or Statute Citation field. Use NR 664 citations for licensed facilities; use NR 662.034(1)(a) for large generators, which requires the LQG to comply with subch. CC standards in ch. NR 665 (interim licensed facility standards). This inspection report includes the following:

(Section C: Container Level 2 Standards)
Section D: Container Level 3 Standards
Section E: Tank Level 2 Standards – Fixed-Roof Tank with an Internal Floating Roof
Section F: Tank Level 2 Standards – External Floating Roof
Section G: Tank Level 2 Standard - Tank Vented to a Control Device
Section H: Tank Level 2 Standards – Pressure Tank
Section I: Level 2 Standards – Enclosure Vented through a Closed-Vent System to a Combustion Control Device
Section J: Standards for Closed Vent Systems and Control Devices – Vapor Incinerators
Section K: Standards for Closed Vent Systems and Control Devices – Condensers
Section L: Standards for Closed Vent Systems and Control Devices - Boiler or Process Heater
Section M: Standards for Closed Vent Systems and Control Devices - Flares
Section N: Standards for Closed Vent Systems and Control Devices - Carbon Adsorption Units
Section O: General Standards for All Closed-Vent Systems and Control Devices
Section P: Standards for Closed Vent Systems and Control Devices - Recordkeeping Requirements

Section C: Container Level 2 Standards

	1. Does the facility manage hazardous waste containers with a design capacity >119 gallons that are in light material service? If NO, go to Section D.	☒ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1086(4)(a)** NR 665.1087(4)(a)	2. Are any of the following controls used on Level 2 containers? ☒ Container meets applicable US DOT packaging requirements. ☒ Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. X Checks are made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. X The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container. A demonstration has been made within the preceding 12 months to show that the container is vapor-tight using Method 27 in appendix A of 40 CFR part 60. ____ A pressure change of 750 Pascals or less occurs within 5 minutes of the container being pressurized to at least 4,500 Pascals.	☒ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1086(3)(e)** NR 665.1087(3)(e)	3. Does the facility maintain a copy of the procedure used to determine that containers which are >119 gallons in size and do not meet DOT requirements, are not managing hazardous waste in light material service?	☐ Yes ☐ No ☒ N/A

NR 662.034(1)(a)2. **NR 664.1086(4)(b)** NR 665.1087(4)(b)	4. Are wastes transferred in or out of the container using level 2 controls that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices?	☒ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1086(4)(c)1.a.** NR 665.1087(4)(c)1.a.	5. If the container is filled to the final level in one continuous operation, are the closure devices promptly secured in the closed position when the filling operation is concluded?	☒ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1086(4)(c)1.b** NR 665.1087(4)(c)1.b.	6. If the container is batch filled, are the closure devices promptly secured in a closed position when any of the following occurs? ☐ Upon filling the container to the intended final level. ☐ The batch loading is completed and any of the following first occurs: ___ No additional material will be added within 15 minutes. ___ The person performing the loading operation leaves the immediate vicinity of the container. ___ The process generating the waste shuts down.	☐ Yes ☐ No ☒ N/A
NR 662.034(1)(a)2. **NR 664.1086(4)(c)2.b.** NR 665.1087(4)(c)2.b.	7. If containers are opened to remove hazardous waste, are closure devices secured in the closed position upon completion of a batch removal and either of the following first occurs? ☐ No additional materials will be removed within 15 minutes. ☐ The person removing the waste leaves the immediate vicinity of the container.	☐ Yes ☐ No ☒ N/A no batch filling
NR 662.034(1)(a)2. **NR 664.1086(4)(c)3.** NR 665.1087(4)(c)3.	8. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), is the closure device secured in the closed position promptly after completing the activity?	☒ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1086(4)(c)4.** NR 665.1087(4)(c)4.	9. If the container is equipped with a pressure relief device that vents to the atmosphere, are all of the following conditions met? tanker ☐ The device is designed to operate with no detectable organic emissions when in the closed position. ☐ The device is closed when the internal pressure is within the specified operating range. ☐ The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	☐ Yes ☐ No ☒ N/A
NR 662.034(1)(a)2. **NR 664.1086(4)(c)5.** NR 665.1087(4)(c)5.	10. Are safety valves only opened to avoid an unsafe condition?	☐ Yes ☐ No ☒ N/A
NR 662.034(1)(a)2. **NR 664.1086(4)(d)3.** NR 665.1087(4)(d)3.	11. When a defect is detected, are the following repairs made? ☒ Initial repair efforts are made within 24 hours of detection and completed within 5 calendar days ☒ If repairs cannot be completed in 5 days, the waste is removed from the container which is not used until the defect is repaired.	☒ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1086(4)(d)1.** NR 665.1087(4)(d)1.	12. When first taking possession of a container that will not be emptied within 24 hours, does the treatment, storage or disposal facility visually inspect the container, cover and closure device for visible cracks, holes, gaps or other open spaces on or before the date the facility accepts the container (e.g., signs the manifest)? totes	☒ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1086(4)(d)2.** NR 665.1087(4)(d)2.	13. If the container remains at the treatment, storage or disposal facility for one year or more, is the container, its cover and closure devices visually inspected initially and at least once every 12 months for cracks, gaps or other open spaces?	☐ Yes ☐ No ☒ N/A
NR 662.034(1)(a)2. **NR 664.0015(4)** NR 665.0015(4)	14. If the facility has been issued a final or interim license, are the results of the inspections maintained in an inspection log for at least 3 years?	☒ Yes ☐ No ☐ N/A
Section D: Container Level 3 Standards		
	1. Does the facility manage hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere? If NO, go to Section E.	☐ Yes ☐ No

NR 662.034(1)(a)2. **NR 664.1086(5)(a)** NR 665.1087(5)(a)	2. Is one of the following controls used on Level 3 containers? ___ The container is vented directly through a closed-vent system to a control device. ___ The container is vented inside an enclosure which is exhausted through a closed-vent system to a control device.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1086(5)(b)1.** NR 665.1087(5)(b)1.	3. If the container is vented inside an enclosure, is the enclosure operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51?	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1089(4)(a)** NR 665.1090(4)(a)	4. Are records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 maintained at the facility?	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1086(5)(f)** NR 665.1087(5)(f)	5. If wastes are transferred in or out of the container, are level 3 controls used that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices?	☐ Yes ☐ No ☐ N/A
Section E: Tank Level 2 Standards – Fixed-Roof Tank with an Internal Floating Roof		
	1. Does the facility manage hazardous waste in a fixed roof tank with an internal floating roof subject to subch. CC requirements? If NO, go to Section F.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1089(2)(b)2.** NR 665.1090(2)(b)2.	2. Is documentation describing the floating roof design maintained at the facility?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(5)(a)1.** NR 665.1085(5)(a)1.	3. Does the internal floating roof float on the liquid surface except when the floating roof is supported by the leg supports?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(5)(a)2.** NR 665.1085(5)(a)2.	4. Is the internal floating roof equipped with a continuous seal between the wall of the tank and the floating roof edge that meets either of the following? ☐ The single continuous seal is a liquid-mounted seal or a metallic shoe seal. ☐ Two continuous seals are mounted one above the other.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(5)(a)3.** NR 665.1085(5)(a)3.	5. Does the internal floating roof meet all of the following specifications? ☐ Each opening in a non-contact internal floating roof has a projection below the liquid surface, except for automatic bleeder vents and rim space vents. ☐ Each opening has a gasketed cover or lid, except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells and stub drains. ☐ Each penetration of the internal floating roof for sampling has a slit fabric cover covering at least 90% of the opening. ☐ Each automatic bleeder vent and rim space vent is gasketed. ☐ Each penetration for passage of a ladder has a gasketed sliding cover. ☐ Each penetration for passage of a column supporting the fixed roof has a flexible fabric sleeve seal or gasketed sliding cover.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(5)(b)** NR 665.1085(5)(b)	6. Is the tank operated according to all of the following? ☐ When the floating roof is resting on leg supports, the process of filling or emptying is continuous and completed as soon as practical. ☐ When the roof is floating, automatic bleeder vents are closed at all times, except when the roof is floated off or being landed on leg supports. ☐ Before filling, each cover, access hatch, gauge float well or lid is fastened or bolted closed. ☐ Rim space vents are set to open only when the internal floating roof is not floating or the pressure beneath the rim exceeds the manufacturer's recommended setting.	☐ Yes ☐ No

NR 662.034(1)(a)2. **NR 664.1084(5)(c)1.** NR 665.1085(5)(c)1.	7. Are the internal floating roof and its closure devices visually inspected for the following defects that could cause air emissions? ☐ The internal floating roof is not floating on the surface of the liquid inside the tank. ☐ Liquid has accumulated on the top of the internal floating roof. ☐ A portion of the roof seals have detached from the roof rim. ☐ Holes, tears, or other openings are visible in the seal fabric. ☐ Gaskets do not close off the hazardous waste surface from the atmosphere. ☐ The slotted membrane has more than 10% open area.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(5)(c)3.** NR 665.1085(5)(c)3.	8. If the roof has 2 continuous seals mounted one above the other, are the internal floating roof, primary and secondary seals, gaskets, slotted membranes and sleeve seals visually inspected each time the tank is emptied and degassed, and at least every 5 years.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1084(5)(c)2.** NR 665.1085(5)(c)2.	9. Are the following inspections conducted? ☐ Components of the floating roof are visually inspected through openings on the fixed-roof at least once every 12 months after the initial fill. ☐ The internal floating roof, primary seal, secondary seal, gaskets, slotted membranes and sleeve seals are visually inspected each time the tank is emptied and degassed, and at least every 10 years.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(5)(c)4.** NR 665.1085(5)(c)4.	10. Is the department given the following notification of an inspection? ☐ Written notification is received 30 days before filling an emptied and degassed tank. ☐ If an unplanned inspection, notify by telephone and follow-up with a written explanation of why the unplanned inspection occurred so it is received 7 calendar days before refilling the tank.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1084(5)(c)5.** NR 665.1085(5)(c)5.	11. Are first efforts of repair made within 5 calendar days of detection and completed no later than 45 calendar days? ___ Repair is delayed until the next time the process or unit generating the waste stops operation because the tank must be emptied for repair and there is no alternate tank capacity.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1084(5)(c)6.** NR 665.1085(5)(c)6.	12. Are inspection records maintained for at least 3 years which include all of the following? ☐ The tank ID#. ☐ The date of inspection. ☐ The location and description of the defect. ☐ The date the problem was detected and the corrective action taken. ☐ The reason repair was delayed and the date of completion, if applicable.	☐ Yes ☐ No
Section F: Tank Level 2 Standards – External Floating Roof		
	1. Does the facility manage hazardous waste in a tank with an external floating roof subject to subch. CC requirements? If NO, go to Section G.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(6)(a)1.** NR 665.1085(6)(a)1.	2. Is the external floating roof designed to float on the liquid surface except when the floating roof is supported by the leg supports?	☐ Yes ☐ No

NR 662.034(1)(a)2. **NR 664.1084(6)(a)2.** NR 665.1085(6)(a)2.	3. Is the floating roof equipped with 2 continuous seals, one above the other between the wall of the tank and the roof edge, which meet all of the following requirements? ☐ The total area of the gaps between the tank wall and the primary seal does not exceed 212 cm^2/m of tank diameter and the width of any portion of the gaps does not exceed 3.8 cm. ☐ The primary or lower seal is a liquid-mounted seal or a metallic shoe seal. ☐ A metallic shoe seal used as a primary seal has one end extending into the liquid and the other end extending a vertical distance of at least 61 cm above the liquid surface. ☐ The secondary seal is mounted above the primary seal and the annular space between the floating roof and the wall of the tank is covered. ☐ The total area of gaps between the tank wall and the secondary seal does not exceed 21.2 cm^2/m of tank diameter and the width of any portion of these gaps does not exceed 1.3 cm.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(6)(a)3.** NR 665.1085(6)(a)3.	4. Does the external floating roof meet all of the following specifications? ☐ All openings in a non-contact external floating roof project below the liquid surface, except for automatic bleeder vents and rim space vents. ☐ Each opening in the roof is equipped with a gasketed cover, seal or lid, except for automatic bleeder vents, rim space vents, roof drains and leg sleeves. ☐ Each access hatch and gauge float well is equipped with a cover designed to be bolted or fastened when the cover is secured in the closed position. ☐ Each automatic bleeder vent and rim space vent is equipped with a gasket. ☐ Each roof drain that empties into the liquid in the tank is equipped with a slotted membrane fabric cover that covers at least 90% of the area of the opening. ☐ Each unslotted and slotted guide pole well is equipped with a gasketed sliding cover or a flexible fabric sleeve seal. ☐ Each unslotted guide pole is equipped with a gasketed cap on the end of the pole. ☐ Each slotted guide pole is equipped with a gasketed float or other device which closes off the liquid surface from the atmosphere. ☐ Each gauge hatch and sample well is equipped with a gasketed cover.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(6)(b)** NR 665.1085(6)(b)	5. Is the tank operated according to all of the following? ☐ When the floating roof is resting on the leg supports, the process of filling or emptying is continuous and completed as soon as practical. ☐ Except for automatic bleeder vents, rim space vents, roof drains and leg sleeves, each opening in the roof is secured and maintained in the closed position except when open for access. ☐ Covers are fastened or bolted on each access hatch and gauge float well when secured in the closed position. ☐ Automatic bleeder vents are set to closed when the roof is floating, except when the roof is being floated off or being landed on the leg supports. ☐ Rim space vents are set to open when the roof is being floated off the roof leg supports or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting. ☐ The cap on the end of each unslotted guide pole is secured in the closed position except when measuring the liquid level or sampling the liquid. ☐ The cover on each gauge hatch or sample well is secured in the closed position except when opened for access. ☐ The primary and secondary seals completely cover the annular space between the external floating roof and the wall of the tank in a continuous fashion, except during inspections.	☐ Yes ☐ No

NR 662.034(1)(a)2. **NR 664.1084(6)(c)1.** NR 665.1085(6)(c)1.	6. Are all of the following inspections conducted on the external floating roof? ☐ Gaps between the tank wall and the primary seal are measured within 60 days of initial operation and then at least once every 5 years. ☐ Gaps between the tank wall and secondary seal are measured within 60 days of initial operation and then at least once every year. Note: If the tank does not hold hazardous waste for one year or more, subsequently adding hazardous waste to the tank is considered an initial operation per NR 664.1084(6)(c)1.c. and NR 665.1085(6)(c)1.c.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1089(2)(b)3.** NR 665.1090(2)(b)3.	7. Are all of the following records maintained at the facility? ☐ Description of the floating roof design and dimensions of the tank. ☐ Records for each seal gap inspection include all of the following: ___ The date the measurements were performed. ___ The raw data obtained for the measurements. ___ The calculations of the total gap surface area. ___ A description of repairs that were made. ___ The date repairs were made. ___ The date the tank was emptied, if necessary.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(6)(c)2.a.** NR 665.1085(6)(c)2.a.	8. Are the external floating roof and its closure devices visually inspected for the following defects that could cause air pollutant emissions? ☐ Holes, tears or other openings in the rim seal or seal fabric of the floating roof. ☐ A rim seal detached from the floating roof. ☐ All or a portion of the floating roof deck being submerged below the surface of the liquid in the tank. ☐ Broken, cracked or otherwise damaged seals or gaskets on closure devices. ☐ Broken or missing hatches, access covers, caps or other closure devices.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(6)(c)2.b.** NR 665.1085(6)(c)2.b.	9. Are visual inspections done according to all of the following? ☐ An initial visual inspection was performed on the external floating roof and its closure devices on or before the date the tank became subject to CC requirements. ☐ At least once every year. ☐ If more than a year lapses between visual inspections, all of the following have been met: ___ The external floating roof or closure device has been designated as "unsafe to inspect and monitor". ___ A written explanation stating the reasons why the floating roof or closure device is unsafe to visually inspect or monitor has been prepared. ___ A written plan and schedule for inspecting and monitoring the roof or closure device has been developed and implemented which allows for inspections as frequently as practical when a worker can gain safe access.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(6)(c)3.** NR 665.1085(6)(c)3.	10. Is the department given the following notification of an inspection? ☐ Written notification at least 30 days before filling an emptied and degassed tank or measuring external floating roof seal gaps. ☐ If an unplanned inspection, notify by telephone and follow-up with a written explanation of why the unplanned inspection occurred so it is received 7 calendar days before refilling the tank.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1084(6)(c)2.c.** NR 665.1085(6)(c)2.c.	11. Are first efforts of repair made within 5 calendar days of detection and completed no later than 45 calendar days? ___ Repair is delayed until the next time the process or unit generating the waste stops operation because the tank must be emptied for repair and there is no alternate tank capacity.	☐ Yes ☐ No ☐ N/A

NR 662.034(1)(a)2. **NR 664.1084(6)(c)2.d.** NR 665.1085(6)(c)2.d.	12. Are inspection records maintained for at least 3 years which include all of the following? ☐ The tank ID#. ☐ The date of inspection. ☐ The location and description of the defect. ☐ The date the problem was detected and the corrective action taken. ☐ The reason repair was delayed and the date of completion, if applicable.	☐ Yes ☐ No
Section G: Tank Level 2 Standard - Tank Vented to a Control Device		
	1. Does the facility manage hazardous waste in a tank subject to subch. CC requirements that is vented to a control device? If NO, go to Section H.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(7)(a)** NR 665.1085(7)(a)	2. Is the tank covered with a fixed roof and vented directly through a closed-vent system to a control device?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(7)(a)1.** NR 665.1085(7)(a)1.	3. Do the fixed roof and closure devices form a continuous barrier over the entire surface area of the liquid?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(7)(a)2.** NR 665.1085(7)(a)2.	4. Is each opening in the fixed roof that is not vented to the control device equipped with a closure device according to the following? ☐ If the pressure in the vapor headspace underneath the fixed roof is less than atmospheric pressure, the closure device operates with no visible cracks, holes or other open spaces. ☐ If the pressure in the vapor headspace underneath the fixed roof is equal to or greater than atmospheric pressure, the closure devices operate with no detectable organic emissions (<500 ppmv) .	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(7)(a)3.** NR 665.1085(7)(a)3.	5. Are the fixed roof and closure devices made of suitable materials to minimize exposure of hazardous waste to the atmosphere and maintain integrity throughout their intended service life?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(7)(b)1.** NR 665.1085(7)(b)1.	6. Is the fixed roof installed with each closure device secured in the closed position except to conduct routine inspections or remove sludge from the tank?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(7)(b)1.** NR 665.1085(7)(b)1.	7. Is the vapor headspace underneath the fixed roof vented to the control device except to conduct routine inspections or remove sludge from the tank?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(7)(b)2.** NR 665.1085(7)(b)2.	8. Are safety devices only opened to avoid an unsafe condition?	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1084(7)(c)1.** NR 665.1085(7)(c)1.	9. Are the fixed roof and closure devices visually inspected for defects that could result in air pollutant emissions, including all of the following? ☐ Visible cracks, holes or gaps in the roof sections or between the roof and the tank wall. ☐ Broken, cracked or otherwise damaged seals or gaskets on closure devices. ☐ Broken or missing hatches, access covers, caps or other closure devices.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(7)(c)3.** NR 665.1085(7)(c)3.	10. Are visual inspections done according to all of the following? ☐ An initial visual inspection was performed on the external floating roof and its closure devices on or before the date the tank became subject to CC requirements. ☐ Conducted at least once every year. ☐ If more than a year lapses between visual inspections, all of the following have been met: ___ A cover has been designated as "unsafe to inspect and monitor". ___ A written explanation stating the reasons why the cover is unsafe to visually inspect or monitor has been prepared. ___ A written plan and schedule for inspecting and monitoring the cover has been developed and implemented which allows for inspections as frequently as practical during those times when a worker can gain safe access.	☐ Yes ☐ No

NR 662.034(1)(a)2. **NR 664.1084(11)** NR 665.1085(11)	11. Are first efforts of repair made within 5 calendar days of detection and completed no later than 45 calendar days? ___ Repair is delayed until the next time the process or unit generating the waste stops operation because the tank must be emptied for repair and there is no alternate tank capacity.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1089(2)(a)** NR 665.1090(2)(a)	12. Are inspection records maintained for at least 3 years which include all of the following? ☐ The tank ID#. ☐ The date of inspection. ☐ The location and description of the defect. ☐ The date the problem was detected and the corrective action taken. ☐ The reason repair was delayed and the date of completion, if applicable.	☐ Yes ☐ No
Section H: Tank Level 2 Standards – Pressure Tank		
	1. Does the facility manage hazardous waste in a pressure tank subject to subch. CC requirements? If NO, go to Section I.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(8)(a)** NR 665.1085(8)(a)	1. When the tank is filled to its design capacity, does venting to the atmosphere not occur due to the compression of the vapor headspace in the tank?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(8)(b)** NR 665.1085(8)(b)	2. Are all tank openings equipped with closure devices designed to operate with no detectable organic emissions (< 500 ppmv)?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1084(8)(c)** NR 665.1085(8)(c)	3. Is the tank operated as a closed system that does not vent to the atmosphere except when a safety device is opened to avoid an unsafe condition or when the tank is purged? ☐ When purged, the purge stream is directed to the closed-vent system and control device.	☐ Yes ☐ No
Section I: Level 2 Standards – Enclosure Vented through a Closed-Vent System to a Combustion Control Device		
NR 662.034(1)(a)2. **NR 664.1084(9)(a)** NR 665.1085(9)(a)	1. Is the tank located inside an enclosure designed and operated according to Method 204 of appendix M of 40 CFR part 51? If NO, go to Section J.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1089(2)(b)4.** NR 665.1090(2)(b)4.	2. Are the most recent set of calculations and measurements verifying that the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 maintained at the facility?	☐ Yes ☐ No
Section J: Standards for Closed Vent Systems and Control Devices – Vapor Incinerators		
	1. Is the control device a vapor incinerator? If NO, go to Section K.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(3)(a)2.** NR 665.1088(3)(a)2. NR 664.1033(3) NR 665.1033(3)	2. Is the vapor incinerator designed and operated to result in any of the following? ☐ Reduce the organic emissions by 95 weight percent or greater. ☐ Achieve a total organic compound concentration of 20 ppmv, expressed as the sum of actual compounds on a dry basis corrected to 3% oxygen. ☐ Provide a minimum residence time of 0.50 seconds at a minimum temperature of 760°C.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(3)(g)** NR 665.1088(3)(g) NR 664.1033(6)(b) NR 665.1033(6)(b)	3. Is a temperature monitoring device with a continuous recorder maintained and operated to continuously monitor the operation of the thermal or catalytic vapor incinerator?	☐ Yes ☐ No

NR 662.034(1)(a)2. **NR 664.1087(3)(e)3.** **NR 665.1088(3)(e)3.** NR 664.1034(3) NR 665.1034(3)	4. If performance tests were conducted, do they comply with all of the following? ☐ Total organic compound concentrations and mass flow rates entering and exiting the control device are determined according to all of the following: ___ Method 2 in appendix A of 40 CFR part 60 is used to determine the velocity and volumetric flow rate. ___ Method 18 in appendix A of 40 CFR part 60 is used to determine organic content. ___ Each performance test consists of 3 separate runs at least one hour each, under the highest load or capacity expected. ___ Total organic mass flow rate and annual total organic emission rates are determined by performing the correct calculations. ___ The total organic emissions from all affected process vents are calculated by adding the hourly total organic mass emission rates and by adding the annual total organic mass emission rates. ☐ All process information, including representative conditions, used during the performance tests are recorded. ☐ Information that the following performance testing facilities were made available: ___ Adequate sampling ports for the required test methods. ___ A safe sampling platform. ___ Safe access to the sampling platform. ___ Utilities for sampling and testing equipment. ☐ The time-weighted average of the results from 3 runs is used to determine compliance.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1087(3)(e)4.** NR 665.1088(3)(e)4. NR 664.1035(2)(d)3 NR 665.1035(2)(d)3	5. If engineering calculations are used for a thermal vapor incinerator, does the design analysis address both of the following? ☐ Considers the vent stream composition, constituent concentrations and flow rate. ☐ Establishes the design minimum, the average temperature in the combustion zone and the combustion zone residence time.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1087(3)(e)4.** NR 665.1088(3)(e)4. NR 664.1035(2)(d)3. NR 665.1035(2)(d)3.	6. If engineering calculations are used for a catalytic vapor incinerator does the design analysis address both of the following? ☐ Considers the vent stream composition, constituent concentrations and flow rate. ☐ Establishes the design minimum and average temperatures across the catalyst bed inlet and outlet.	☐ Yes ☐ No ☐ N/A
Section K: Standards for Closed Vent Systems and Control Devices – Condensers		
	1. Is the control device a condenser? If NO, go to Section L.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(3)(g)** NR 665.1088(3)(g) NR 664.1033(6)(b)6. NR 665.1033(6)(b)6.	2. Is one of the following devices maintained and operated to continuously monitor the operation of the condenser? ☐ A monitoring device with a continuous recorder to measure the organic compound concentration level in the exhaust vent stream from the condenser. ☐ A temperature monitoring device with a continuous recorder.	☐ Yes ☐ No

NR 662.034(1)(a)2. **NR 664.1087(3)(e)3.** NR 665.1088(3)(e)3. NR 664.1034(3) NR 665.1034(3)	3. If performance tests were conducted, do they comply with all of the following? ☐ Total organic compound concentrations and mass flow rates entering and exiting the control device are determined according to all of the following: ___ Method 2 in appendix A of 40 CFR part 60 is used to determine the velocity and volumetric flow rate. ___ Method 18 in appendix A of 40 CFR part 60 is used to determine organic content. ___ Each performance test consists of 3 separate runs at least one hour each, under the highest load or capacity expected. ___ Total organic mass flow rate and annual total organic emission rate are calculated correctly. ___ The total organic emissions from all affected process vents are calculated by adding the hourly total organic mass emission rates and by adding the annual total organic mass emission rates. ☐ All process information, including representative conditions, used during the performance tests are recorded. ☐ Information that the following performance testing facilities were made available: ___ Adequate sampling ports for the required test methods. ___ A safe sampling platform. ___ Safe access to the sampling platform. ___ Utilities for sampling and testing equipment. ☐ The time-weighted average of the results from 3 runs is used to determine compliance.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1087(3)(e)4.** NR 665.1088(3)(e)4. NR 664.1035(2)(d)3. NR 665.1035(2)(d)3.	4. If engineering calculations are used for a condenser, does the design analysis address both of the following? ☐ Considers the vent stream composition, constituent concentrations, flow rate, relative humidity and temperature. ☐ Establishes the design outlet organic compound concentration level, design average temperature of the condenser exhaust vent stream and design average temperatures of the coolant fluid at the condenser inlet and outlet.	☐ Yes ☐ No ☐ N/A
Section L: Standards for Closed Vent Systems and Control Devices - Boiler or Process Heater		
	1. Is the control device a boiler or process heater? If NO, go to Section M.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(3)(a)2.** NR 665.1088(3)(a)2. NR 664.1033(3) NR 665.1033(3)	2. Is the boiler or process heater designed and operated to result in any of the following? ☐ Reduce the organic emissions by 95 weight percent or greater. ☐ Achieve a total organic compound concentration of 20 ppmv, expressed as the sum of actual compounds on a dry basis corrected to 3% oxygen. ☐ Provide a minimum residence time of 0.50 seconds at a minimum temperature of 760°C.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(3)(g)** NR 665.1088(3)(g) NR 664.1033(6)(b)4. NR 665.1033(6)(b)4.	3. Is a temperature monitoring device with a continuous recorder maintained and operated to continuously monitor a boiler or process heater with a design heat input capacity less than 44 megawatts?	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1087(3)(g)** NR 665.1088(3)(g) NR 664.1033(6)(b)5. NR 665.1033(6)(b)5.	4. Is a monitoring device with a continuous recorder that measures a parameter indicating good combustion operating practices maintained and operated to monitor the operation of a boiler or process heater with a design heat input capacity of 44 megawatts or more?	☐ Yes ☐ No ☐ N/A

NR 662.034(1)(a)2. **NR 664.1087(3)(e)1.** NR 665.1088(3)(e)1.	5. Does the boiler or process heater meet any of the following? If YES, go to Section N. ☐ The design heat input capacity is 44 megawatts or greater. ☐ The vent stream is introduced into the boiler or process heater with the primary fuel. ☐ The boiler or industrial furnace has been issued an interim or operating license to burn hazardous waste and is designed and operated according to subch. H of ch. NR 666.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(3)(e)3.** NR 665.1088(3)(e)3. NR 664.1034(3) NR 665.1034(3)	6. If performance tests were conducted, do they comply with all of the following? ☐ Total organic compound concentrations and mass flow rates entering and exiting the control device are determined according to all of the following: ___ Method 2 in appendix A of 40 CFR part 60 is used to determine the velocity and volumetric flow rate. ___ Method 18 in appendix A of 40 CFR part 60 is used to determine organic content. ___ Each performance test consists of 3 separate runs at least one hour each, under the highest load or capacity expected. ___ Total organic mass flow rate and annual total organic emission rate are correctly calculated. ___ The total organic emissions from all affected process vents are calculated by adding the hourly total organic mass emission rates and by adding the annual total organic mass emission rates. ☐ All process information, including representative conditions, used during the performance tests are recorded. ☐ Information that the following performance testing facilities were made available: ___ Adequate sampling ports for the required test methods. ___ A safe sampling platform. ___ Safe access to the sampling platform. ___ Utilities for sampling and testing equipment. ☐ The time-weighted average of the results from 3 runs is used to determine compliance.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1087(3)(e)4.** NR 665.1088(3)(e)4. NR 664.1035(2)(d)3. NR 665.1035(2)(d)3.	7. If engineering calculations are used for a boiler or process heater, does the design analysis address both of the following? ☐ Considers the vent stream composition, constituent concentrations and flow rate. ☐ Establishes the design minimum and average flame zone temperatures, combustion zone residence time and description of method and location where the vent or equipment stream is introduced into the combustion zone.	☐ Yes ☐ No ☐ N/A
Section M: Standards for Closed Vent Systems and Control Devices – Flares		
	1. Is the control device a flare? If NO, go to Section N.	☐ Yes ☐ No

NR 662.034(1)(a)2. **NR 664.1087(3)(a)3.** NR 665.1088(3)(a)3. NR 664.1033(4) NR 665.1033(4)	2. Is the flare designed and operated according to all of the following? ☐ No emissions are visible except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. ☐ The flare is present at all times. ☐ The flare is steam-assisted, air-assisted or non-assisted. ☐ The net heating value of the gas being combusted is either of the following: ___ If the flare is steam or air-assisted, 300 Btu/scf or more. ___ If the flare is non-assisted, 200 Btu/scf or more. ☐ If the flare is air assisted, the exit velocity is less than V_{max}. ☐ If the flare is steam-assisted or non-assisted, the exit velocity of the flare is one of the following: ___ Less than 60 ft/sec. ___ Between 60 ft/sec and 400 ft/sec if the net heating value of the gas is greater than 1000 Btu/scf. ___ Less than the maximum velocity, V_{max}, and less than 400 ft/sec.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(3)(e)2.** NR 665.1087(3)(e)2. NR 664.1033(5) NR 665.1033(5)	3. Does the flare meet all of the following requirements? ☐ Compliance with the visible emissions requirement has been determined using Method 22 in appendix A of 40 CFR part 60. ☐ The following have been calculated correctly: ___ Net heating value of the gas being combusted. ___ Actual exit velocity. ___ Maximum allowed velocity or V_{mx}.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(3)(g)** NR 665.1088(3)(g) NR 664.1033(6)(b)3. NR 665.1033(6)(b)3.	4. Is the flare equipped with a heat sensing monitoring device and continuous recorder that meets both of the following? ☐ Indicates the continuous ignition of the pilot flame. ☐ The device is maintained and operated to continuously monitor the operation of the flare.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(3)(e)4.** NR 665.1088(3)(e)4. NR 664.1035(2)(d)3. NR 665.1035(2)(d)3.	5. If engineering calculations are used for a flare, does the design analysis consider the vent stream composition, constituent concentrations, flow rate, and design and operation standards (no visible emissions)?	☐ Yes ☐ No ☐ N/A
Section N: Standards for Closed Vent Systems and Control Devices - Carbon Adsorption Units		
	1. Is the control device a carbon adsorption unit? If NO, go to Section O.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(3)(c)** NR 665.1088(3)(c)	2. Is the carbon adsorption system designed and operated to reduce the total organic content of the inlet vapor stream by at least 95% by weight?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(3)(c)1.** NR 665.1088(3)(c)1. NR 664.1035(2)(d)3. NR 665.1033(7)	3. If the facility uses a fixed-bed carbon adsorption system that regenerates the carbon bed in the control device, is the carbon replaced with fresh carbon at regular, pre-determined time intervals that are shorter than the carbon service life?	☐ Yes ☐ No ☐ N/A

NR 662.034(1)(a)2. **NR 664.1087(3)(c)1.** NR 665.1088(3)(c)1. NR 664.1033(8) NR 665.1033(8)	4. If the carbon bed is not regenerated in the control device, is the existing carbon replaced with fresh carbon on a regular basis using either of the following procedures? ☐ The concentration level of organic compounds in the exhaust vent stream is monitored and the existing carbon is immediately replaced when carbon breakthrough is indicated. ___The monitoring frequency is either daily or at an interval no more than 20% of the time required to consume the total carbon working capacity, whichever is longer. ☐ The existing carbon is replaced at a regular pre-determined time interval that is less than the design carbon replacement interval.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1087(3)(c)2.** NR 665.1088(3)(c)2. NR 664.1033(14) NR 665.1033(13)	5. Does the facility document that carbon removed from the carbon adsorption system is managed as a hazardous waste by one of the following methods? ☐ Regenerated in a thermal treatment unit licensed or permitted as a miscellaneous unit; or, in compliance with NR 665 subch AA, BB, CC or the Clean Air Act requirements. ☐ Incinerated in a licensed or permitted hazardous waste incinerator. ☐ Burned in a licensed or permitted boiler or industrial furnace.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1087(3)(g)** NR 665.1088(3)(g) NR 664.1033(6)(b)7. NR 665.1033(6)(b)7.	6. Is one of the following devices maintained and operated to continuously monitor the operation of a carbon adsorption system that regenerates the carbon bed in the control device? ☐ A monitoring device with a continuous recorder to measure the organic compound concentration level in the exhaust vent stream from the carbon bed. ☐ A monitoring device equipped with a continuous recorder to measure a parameter indicating the carbon bed is regenerating on a regular predetermined time cycle.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1087(3)(e)3.** NR 665.1088(3)(e)3. NR 664.1034(3) NR 665.1034(3)	7. Do performance tests comply with all of the following? ☐ Total organic compound concentrations and mass flow rates entering and exiting the control device are determined according to all of the following: ___ Method 2 in appendix A of 40 CFR part 60 is used to determine the velocity and volumetric flow rate. ___ Method 18 in appendix A of 40 CFR part 60 is used to determine organic content. ___ Each performance test consists of 3 separate runs at least one hour each, under the highest load or capacity expected. ___ Total organic mass flow rate and annual total organic emission rate are correctly calculated. ___ The total organic emissions from all affected process vents are calculated by adding the hourly total organic mass emission rates and by adding the annual total organic mass emission rates. ☐ All process information, including representative conditions, used during the performance tests are recorded. ☐ Information that the following performance testing facilities were made available: ___ Adequate sampling ports for the required test methods. ___ A safe sampling platform. ___ Safe access to the sampling platform. ___ Utilities for sampling and testing equipment. ☐ The time-weighted average of the results from 3 runs is used to determine compliance.	☐ Yes ☐ No ☐ N/A

NR 662.034(1)(a)2. **NR 664.1087(3)(e)4.** NR 665.1088(3)(e)4. NR 664.1035(2)(d)3. NR 665.1035(2)(d)3.	8. If engineering calculations are used for a carbon adsorption system that regenerates the carbon bed on-site in the control device, does the design analysis address both of the following? ☐ Considers the vent stream composition, constituent concentrations, flow rate, relative humidity and temperature. ☐ Establishes the design exhaust vent stream organic compound concentration level, number and capacity of carbon beds, type and working capacity of activated carbon used for carbon beds, design total steam flow over the period of each complete carbon bed regeneration cycle, duration of the carbon bed steaming and cooling or drying cycles, design carbon bed temperature after regeneration, design carbon bed regeneration time and design service life of carbon.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1087(3)(e)4.** NR 665.1088(3)(e)4. NR 664.1035(2)(d)3. NR 665.1035(2)(d)3.	9. If engineering calculations are used for a carbon adsorption system that does not regenerate the carbon bed on-site in the control device, does the design analysis address both of the following? ☐ Considers the vent stream composition, constituent concentrations, flow rate, relative humidity and temperature. ☐ Establishes the design outlet organic concentration level, capacity of carbon bed, type and working capacity of activated carbon used for carbon bed and design carbon replacement interval based on the total carbon working capacity of the control device and source operating schedule.	☐ Yes ☐ No ☐ N/A
Section O: General Standards for All Closed-Vent Systems and Control Devices		
NR 662.034(1)(a)2. **NR 664.1087(3)(d)** NR 665.1088(3)(d)	1. If the control device is other than a thermal vapor incinerator, flare, boiler, process heater, condenser or carbon adsorption system, are both of the following met? ☐ The control device is designed and operated to reduce the total organic content of the inlet vapor stream by at least 95% by weight. ☐ The control device is operated and maintained according to the identified process parameters for the unit.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1087(3)(b)5.** NR 665.1088(3)(b)5.	2. Are malfunctions of the control device system corrected as soon as practicable after their occurrence to minimize excess emissions of air pollutants?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(3)(b)1.** NR 665.1088(3)(b)1.	3. Are periods of planned routine maintenance that result in the control device not meeting the design and operating standards limited to 240 hours or less per year?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(3)(b)4.** NR 665.1088(3)(b)4.	4. Does the facility demonstrate that planned routine maintenance is 240 hours or less per year by recording, on a semi-annual basis, all of the following information? ☐ A description of the planned routine maintenance that is anticipated to be performed for the control device during the next 6 months, including the type of maintenance necessary and the length of maintenance periods. ☐ A description of the planned routine maintenance that was performed during the previous 6 months, including the type of maintenance performed and the total number of hours during the 6 months that the control device did not meet the operating standard.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1089(5)(f)** NR 665.1090(5)(f)	5. For unexpected control device system malfunctions, is the following information recorded when the control device does not meet design specifications? ☐ The occurrence and duration of each malfunction. ☐ The duration of each period during a malfunction when gases, vapors or fumes are vented through the control device when it is not functioning. ☐ Actions taken during periods of malfunction to restore a malfunctioning control device to its normal manner of operation.	☐ Yes ☐ No ☐ N/A

NR 662.034(1)(a)2. **NR 664.1087(3)(b)6.** NR 665.1088(3)(b)6.	6. Is the closed-vent system operated such that gases, vapors, or fumes are not actively vented to the control device during periods of planned maintenance or malfunctions, except when venting is necessary to avoid an unsafe condition or implement maintenance?	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1087(2)(b)** NR 665.1088(2)(b) NR 664.1033(11) NR 665.1033(10)	7. Does the closed vent system meet either of the following design requirements? ☐ Operated with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background and by visual inspection. ☐ Operated at a negative pressure (below atmospheric pressure) ___ A pressure gauge or other pressure measuring device is readily accessible to verify operation at negative pressure.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(2)(b)** NR 665.1088(2)(b) NR 664.1033(11)(a) NR 665.1033(10)(a) NR 664.1034(2) NR 665.1034(2)	8. Has testing been conducted to determine if the control device is operating with no detectable emissions (< 500 ppm) according to all of the following? ☐ Each of the following has been conducted according to Method 21 in appendix A of 40 CFR part 60. ___ Monitoring. ___ Performance criteria of the detection instrument. ___ Daily calibration procedures of the detection instrument. ___ Determination of background levels. ___ Determination of potential leak interfaces. ☐ Calibration gases consist of zero air with less than 10 ppm hydrocarbons and a mixture of less than 10,000 ppm methane or n-hexane in air. ☐ The arithmetic difference between the maximum instrument reading and background level is compared to 500 ppm to determine compliance.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(2)(d)** NR 665.1088(2)(d) NR 664.1033(12)(a) NR 665.1033(11)(a)	9. If the closed-vent system is designed to operate with no detectable emissions (<500 ppmv), is proper operation ensured by all of the following? ☐ Initial leak detection monitoring was conducted on or before the date the system was subject to subch. CC to demonstrate the unit operates with no detectable emissions. ☐ At least annually, visually inspect closed-vent system joints, seams or other connections that are permanently or semi-permanently sealed for defects that could result in air pollutant emissions. ☐ Monitor components or connections after repair or replacement to demonstrate they are operating without detectable emissions. ☐ Monitor other components or connections annually. ___ Components are not monitored because they are designated as unsafe. ___ The exposure to an immediate danger has been documented and a written plan for monitoring during safe-to-monitor times is followed.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1087(2)(d)** NR 665.1088(2)(d) NR 664.1033(12)(b) NR 665.1033(11)(b)	10. If the closed-vent system is designed to operate at negative pressure, was it visually inspected for defects (i.e., holes in piping or loose connections) that could result in air pollutant emissions by the date the system was subject to subch. CC and annually thereafter?	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1087(3)(g)** NR 665.1088(3)(g)	11. Are the devices used for continuous monitoring inspected at least once each monitoring day to check on the control device operation?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1087(2)(c)** NR 665.1088(2)(c)	12. If the closed-vent system includes bypass devices that could be used to divert the gas or vapor stream to the atmosphere before entering the control device, has each bypass device been equipped with either of the following? ☐ A flow indicator installed at the inlet to the bypass line at a point upstream of the control device inlet. ☐ A seal or locking device placed on the mechanism (lever or handle) controlling the bypass device position when the bypass device is in the closed position such that the bypass device cannot be opened without breaking the seal or removing the lock.	☐ Yes ☐ No ☐ N/A

NR 662.034(1)(a)2. **NR 664.1087(2)(d)** NR 665.1088(2)(d) NR 664.1033(12)(c) NR 665.1033(11)(c)	13. Are defects corrected according to all of the following schedules? ☐ The first attempt at repair is made within 5 calendar days and is corrected as soon as possible, but no later than 15 calendar days after the emissions are detected. ☐ Complete repair of the equipment is delayed to the end of the next process unit shutdown due to either of the following: ___ Repair is technically infeasible without a process unit shutdown. ___ Emissions from immediate repair would be greater than those resulting from delay of repair.	☐ Yes ☐ No ☐ N/A
Section P: Standards for Closed Vent Systems and Control Devices - Recordkeeping Requirements		
NR 662.034(1)(a)2. **NR 664.1087(2)(d)** NR 665.1088(2)(d) NR 664.1033(12)(c)4. NR 665.1033(11)(c)4. NR 664.1035(3)(j) NR 665.1035(3)(j)	1. When a leak is detected, is all of the following information recorded? ☐ The instrument ID number, the closed-vent system component ID number and the operator name, initials or ID number. ☐ The date the leak was detected and the date of the first attempt to repair. ☐ The date the leak was successfully repaired. ☐ The maximum instrument reading after the leak is successfully repaired or determined to be nonrepairable. ☐ A notation of "repair delayed" and the reason for delay if the leak is not repaired within 15 days.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1035(4)** NR 665.1035(4)	2. Are records of monitoring, operating and inspection information kept for 3 years from the date of each occurrence?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1089(5)(a)** NR 665.1090(5)(a)	3. Does the facility maintain a certification signed and dated by the owner/operator stating that the control device is designed to operate at the performance level documented by a design analysis or by performance tests when the container or tank is operating at capacity?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1089(5)(d)** NR 665.1090(5)(d) NR 664.1035(3)(b) NR 665.1035(3)(b)	4. Does the operating record include all of the following for flow indicators and continuous monitoring devices? ☐ Identification of operating parameters. ☐ Description of monitoring devices. ☐ Diagram of monitoring sensor locations.	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1089(5)(c)** NR 665.1090(5)(c) NR 664.1035(2)(c) NR 665.1035(2)(c)	5. If test data is used to determine the organic removal efficiency or total organic compound concentration achieved by the control device, does the facility have a performance test plan that includes all of the following? ☐ A description of how it is determined that the planned test is conducted when the hazardous waste management unit is operating at the highest load or capacity level reasonably expected to occur, including all of the following information: ___ Estimated or design flow rate and organic content of each vent stream. ___ Definition of the acceptable operating ranges of key processes and control device parameters. ☐ Detailed engineering description of the closed-vent system and control device, including all of the following: ___ Manufacture's name. ___ Model number. ___ Type, dimensions and equipment capacity. ___ Construction materials. ☐ Detailed description of sampling and monitoring procedures, including all of the following: ___ Equipment to be used. ___ Sampling and monitoring locations in the system. ___ Frequency of sampling and monitoring. ___ Planned analytical procedures.	☐ Yes ☐ No ☐ N/A

NR 662.034(1)(a)2. **NR 664.1089(5)(b)** NR 665.1090(5)(b) NR 664.1035(2)(d) NR 665.1035(2)(d)	6. If a design analysis is used, do records include all of the following design documentation for the closed-vent and control devices? ☐ A list of all information references and sources used in preparing the documentation. ☐ Records, including the date, for each compliance test showing that the closed vent system operates with no detectable emissions. ☐ A statement signed and dated by the owner or operator certifying that the operating parameters used in the design analysis represent the conditions that exist when the unit is operating at the highest load reasonably expected to occur. ☐ A statement certifying that the control device is designed to operate at 95% efficiency or more or the total organic emissions are reduced to below 3 lb/hr and 3.1 tons/yr. ___ Owner or operator signed and dated the statement; OR, ___ Manufacturer or vendor certified that the control equipment meets design specifications. ☐ If performance tests are used to demonstrate compliance, all of the test results. ☐ Design analysis, specifications, drawings, schematics, piping and instrument diagrams prepared by the owner or operator or provided by the manufacturer or vendor that describes the control device design information.	☐ Yes ☐ No ☐ N/A
NR 662.034(1)(a)2. **NR 664.1089(5)(d)** NR 665.1090(5)(d) NR 664.1035(3)(a) NR 665.1035(3)(a)	7. Does the operating record include a description and the date of each modification that has been made to the closed-vent system or control device design?	☐ Yes ☐ No
NR 662.034(1)(a)2. **NR 664.1089(1)** NR 665.1090(1)	8. Are records maintained according to the following schedules? ☐ Air emission control equipment design documentation is maintained in the operating record until the air emission control equipment is replaced or otherwise no longer in service. ☐ Information regarding the organic peroxide exclusion is maintained for as long as the container or tank is not using air emission controls. ☐ Information regarding certification and the requirements that apply if the air emission controls are operating according to the state or federal Clean Air Act requirements are maintained for as long as the container or tank is not using air emission controls.	☐ Yes ☐ No ☐ N/A
NR 664.1090(3)	9. For facilities with a final operating license only: If a control device operated continuously in noncompliance for 24 hours or longer or a flare operated with visible emissions for 5 minutes or longer, was a semiannual written report submitted to the department which included all of the following? ☐ The EPA ID#, facility name and address for the facility. ☐ A description of each occurrence of noncompliance during the previous 6-month period. ☐ An explanation of why the control device could not be returned to compliance within 24 hours. ☐ Actions taken to correct the noncompliance. ☐ Signature and date by an authorized representative.	☐ Yes ☐ No ☐ N/A
DNR Inspector Signature		Date

6/15/10 Badger Disposal of WI, Inc.

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265.1080	**Do any of the following exclusions apply? If yes, please circle.**	YES	NO

Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):

1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since.
2. The container capacity is less than .1 cubic meter (26 gallons)
3. A unit (e.g. tank) has stopped adding waste and is undergoing closure
4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program
5. The unit is used solely to manage radioactive mixed waste
6. The unit is regulated by and operates in accordance with Clean Air Act regulations

***Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt**

CC-2	265.1083	**Do any of the following exemptions apply? If yes, please circle**	YES	NO

General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):

1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required)
2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes.
3. The unit is a tank used for certain biological treatment
4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics)
5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements

CC-3	265.1084	**Waste Determination:**	Determination Not Needed	Determination Needed

Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is not needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.

#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DE= Deficiency	NA	NI	OK	DE

CONTAINER MANAGEMENT 265.1087

Level 1	Level 2	Level 3
Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)	Larger than 26.4 gallons and treat H.W. by a stabilization process
CC-4 265.1087 Controls		OK
One of the following: -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container 265.1087(c)	One of the following: -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) 265.1087(d)	-Containers used to stabilize H.W. with volatile organics greater than 500 ppm -For waste stabilized in a container either: 1.container must be vented directly to a control device; or 2.container is vented inside an enclosure which is exhausted through a closed vent to a control device -Conservation vents are not allowed 265.1087(b)(2)

Level 1		Level 2	Level 3			
	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency		NA	NI	OK	DF
CC -5	265.1087	Waste transfer requirements			ok	
No waste transfer requirements apply		-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)	Not applicable			
CC-6	265.1087	Operating requirements			ok	
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)			-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.			
CC-7	265.1089	Inspection requirements			ok	
Minimal inspection required: - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)			Inspection requirements are the same as for tanks			
CC-8	265.1087	Repair requirements			ok	
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired 265.1087(c)(4), (d)(4)			Necessary corrective measures shall be immediately implemented to ensure that the control device is operated in compliance			
CC-9	265.1090	Recordkeeping requirements			ok	
-If container exceeds 122 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. in light material service		Since Level 2 waste is "in light material service", no records need to be kept	Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)			

Comments: